

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

ALPHA PHI ALPHA FRATERNITY  
INC., a nonprofit organization on  
behalf of members residing in Georgia;  
SIXTH DISTRICT OF THE  
AFRICAN METHODIST  
EPISCOPAL CHURCH, a Georgia  
nonprofit organization; ERIC T.  
WOODS; KATIE BAILEY GLENN;  
PHIL BROWN; JANICE STEWART,

*Plaintiffs,*

vs.

BRAD RAFFENSPERGER, in his  
official capacity as Secretary of State  
of Georgia.

*Defendant.*

**Case No. 1:21-CV-05337-SCJ**

**PLAINTIFFS' RENEWED MOTION FOR A PRELIMINARY  
INJUNCTION EXPEDITED TREATMENT REQUESTED**

Pursuant to Rule 65 of the Federal Rules of Civil Procedure, Plaintiffs  
ALPHA PHI ALPHA FRATERNITY, INC., SIXTH DISTRICT OF THE  
AFRICAN METHODIST EPISCOPAL CHURCH, ERIC T. WOODS, KATIE  
BAILEY GLENN, PHIL BROWN, and JANICE STEWART (collectively,

“Plaintiffs”), respectfully move the Court for an Order enjoining Defendant Georgia Secretary of State BRAD RAFFENSPERGER from holding elections under Georgia Senate Bill 1EX and Georgia House Bill 1EX (collectively, the “2021 Senate and House Plans”), redistricting plans that were adopted during the 2021 Georgia legislative session, and to require instead that future elections be conducted under redistricting plans that do not abridge or dilute the ability of Black voters to elect candidates of their choice.

For the reasons set forth in detail in Plaintiffs’ accompanying Memorandum in Support of Plaintiffs’ Renewed Motion for Preliminary Injunction, Plaintiffs have established that they are likely to succeed on the merits of their claim that the newly adopted districting schemes unlawfully dilute the voting strength of Black Georgians in violation of Section 2 of the Voting Rights Act. Further, holding elections using the 2021 Senate and House Plans would irreparably harm Plaintiffs and other Black voters across the State; this harm outweighs any harm Defendant would suffer were the Court to order the relief sought by Plaintiffs; the balance of hardships weighs in Plaintiffs’ favor; and a preliminary injunction is in the public interest.

Plaintiffs respectfully request that the Court expedite consideration of this motion in light of the following upcoming 2022 election-related deadlines: Candidate qualifying begins March 7 and ends March 11, 2022; the special election



date is March 15, 2022; the special election runoff date is April 12, 2022; the general primary election is May 24, 2022; the general primary runoff is on June 21, 2022; and the general election is on November 8, 2022.

Dated: January 13, 2022.

Respectfully submitted,

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**CERTIFICATE OF COMPLIANCE WITH LOCAL RULE 5.1**

The undersigned hereby certifies that the foregoing document has been prepared in accordance with the font type and margin requirements of Local Rule 5.1 of the Northern District of Georgia, using a font type of Times New Roman and a point size of 14.

/s/ Rahul Garabady

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**CERTIFICATE OF SERVICE**

I hereby certify that I have this day caused to be served the foregoing *Plaintiffs' Motion for a Preliminary Injunction* with the Clerk of Court using the CM/ECF system, which will automatically send email notification of such filing to all counsel or parties of record on the service list:

This 7th day of January, 2022.

/s/ Rahul Garabadu

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**PLAINTIFFS' MEMORANDUM OF LAW IN SUPPORT OF THEIR  
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## **INTRODUCTION**

Georgia's newly adopted districting schemes for its General Assembly unlawfully dilute the voting strength of Black Georgians in violation of the Voting Rights Act (the "VRA"). This Court should enjoin their use because Plaintiffs are likely to succeed in this litigation by showing that the challenged plans deny Black voters an opportunity to elect their preferred candidates in at least seven districts (three in the Senate, four in the House) that should have been drawn in and around the Atlanta metro area, Augusta, and Southwest Georgia; and because holding elections using the State's recently enacted maps (the "2021 Maps") would violate the law and irreparably harm Plaintiffs and other Black voters across Georgia.

Section 2 of the VRA makes it unlawful for a state to dilute the voting strength of particular racial groups such that it is more difficult for members of one group to elect their preferred candidates. That is precisely what Georgia's 2021 Maps do. In the last decade, Georgia's Black population grew by nearly half a million people, while the white population declined. Yet the new maps contain the same number of majority-Black State Senate districts, and only two more majority-Black House districts (out of 180) than the previous redistricting plans. The 2021 Maps thus maintain white-majority districts in areas where burgeoning Black populations would support new Black-majority districts, and essentially freeze Black political

power in the General Assembly. That is vote dilution. As Plaintiffs are likely to show, every element of the Section 2 test is met: Plaintiffs have submitted maps with at least seven additional majority-Black districts beyond those in the 2021 Maps and can show that voting in the areas around those districts is racially polarized, such that under the 2021 Maps Black voters will be unable to elect candidates of their choice. The past and present reality of politics in Georgia confirms that Black voters in those areas have less opportunity than other citizens to elect candidates of their choice. That reality includes, among other things, over a century of egregious official discrimination in voting (including well after the passage of the VRA in 1965), unremedied socioeconomic disparities that continue to make voting and participation more difficult, and the persistent inability of Black candidates to win General Assembly elections in the precise areas where the districts challenged in this suit are located.

The newly enacted districting scheme violates the VRA and will cause Plaintiffs irreparable and irremediable harm. The State cannot justify holding elections using illegal, discriminatory districts, which will allow the benefits of incumbency to vest in officeholders who owe their seats to vote dilution. The burden of redrawing the maps to comply with the law is minimal—the 2021 Maps sailed through the legislative process in less than two weeks, and Plaintiffs have already

drawn a remedial plan that complies with the law (the “Illustrative Maps”). Thus, the State can have new, lawful maps in place in time to proceed with the current primary and general election schedule. This Court should enjoin the use of the 2021 Maps.

## **BACKGROUND**

### **A. Georgia’s Black Population Has Grown Tremendously**

Georgia has grown by hundreds of thousands of citizens since legislative districts in the State were last apportioned. That growth has been driven entirely by an increase in the number of persons of color; the State’s white population has declined during that time. *See* Ex. A, Cooper Report (“Cooper”) ¶33. This dramatic demographic shift changed the electorate by increasing the percentage of Black voters and decreasing the percentage of white voters. Cooper ¶43. Over the last decade, Georgia’s Black population grew by 16%, representing almost half a million people. Cooper ¶35. That growth was regionalized and concentrated; much of the Black population growth took place in counties in and around the metro Atlanta area. Cooper ¶¶44, 49-50. And in other areas, such as the Augusta and southwest Georgia regions, the relative size of the Black population increased, even as population decreased overall, due to white population decline. Cooper ¶51. Black Georgians now account for nearly one-third (33.03%) of Georgia’s population and comprise by

far the largest minority population in the state. Cooper ¶¶35-36.

**B. Georgia’s New Legislative Maps Disregard the Growth of the State’s Black Population**

Despite the tremendous growth in the Black population, the 2021 Maps—enacted on December 30, 2021 as part of the decennial redistricting process—fail to provide virtually any new political opportunities for Black Georgians. Instead, the number of majority-Black Senate districts is unchanged from nearly a decade ago, and the number of majority-Black House districts has barely increased. *See* Cooper ¶12. The State’s 2021 Senate Plan (the “2021 Senate Map”) provides for just 14 majority-Black Senate districts out of 56 total Senate districts—the same overall number as existed in the previous plan.<sup>1</sup> Cooper ¶¶13, 58. The State’s 2021 House Plan (the “2021 House Map”) added only two additional Black-majority districts (out of 180) beyond the number in the plan from a decade ago, and only five such districts since 2006. Cooper ¶¶14, 91.

This minimal increase in the number of Black-majority districts in Georgia despite significant Black population growth was orchestrated by “packing” large

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<sup>1</sup> The previous plan contained 15 majority-Black districts when it was enacted, according to 2010 Census data. Two districts slipped below 50% Black voting-age population (“BVAP”) by the time of the 2020 Census, though one, at 49.76% BVAP, is still counted as majority-Black in expert demographer William Cooper’s Report, for a total of 14. *See* Cooper ¶13 n.8, ¶58 n.19.

numbers of Black Georgians into districts that were already majority-Black, and then “cracking” additional communities of Black Georgians by assigning them to districts where their votes would be outweighed by larger numbers of white voters.<sup>2</sup> This continued failure to provide representation adequately accounting for Black population growth is particularly evident in the south Metro Atlanta region. Between 2000 and 2020, the Black population there quadrupled, from 74,249 to 294,914, while the number of majority-Black Senate districts has barely changed. Cooper ¶¶50, 58.

The concentrated growth of Black voters is borne out in the distribution of Black and white voters in the 2021 Maps. Around half of Black voters live in Black-majority districts, while 80% or more non-Hispanic white voters live in white-majority districts. Cooper ¶59. This pattern shows that, under the 2021 Maps, white voters are disproportionately more likely to form a numerical majority in their Senate and House Districts, and Black voters are substantially more likely to find themselves in the minority, where racially polarized voting patterns will usually prevent them from electing candidates of their choice. *See generally* Ex. B, Handley

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<sup>2</sup> *See Vieth v. Jubelirer*, 541 U.S. 267, 286 n.7 (2004) (plurality opinion) (“‘Packing’ refers to the practice of filling a district with a supermajority of a given group .... ‘Cracking’ involves the splitting of a group ... among several districts to deny that group ... a majority in any of those districts.”).

Report (“Handley”) at 11-13. The resulting dilution of Black voting strength occurred in multiple regions across the State with large Black populations where the State could have drawn new majority-Black districts but opted not to do so.

### ***1. Atlanta Metro Area***

In the Atlanta Metro Area, the State denied Black voters an opportunity to elect candidates of their choice in at least two State Senate districts and two House districts. In Senate District 16 under the 2021 Senate Map, Black voters in Fayette and Spalding Counties, both of which have seen double-digit growth in their Black populations (including massive, 50% growth in Fayette County), are combined with rural, majority white areas, resulting in a district that is under 23% Black. Cooper ¶77.<sup>3</sup> Meanwhile, adjacent Senate Districts 34 and 44, which include parts of Fayette and Clayton Counties (the latter being one of the State’s largest), were drawn with Black populations of approximately 70% and 65%. Cooper ¶78. The State should have drawn a new Black-majority district in this area by “unpacking” the Black population in Senate Districts 34 and 44, and “uncracking” the growing Black population in Senate District 16 in Fayette and Spalding Counties. Cooper ¶78. It

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<sup>3</sup> In discussing the percentage of a district’s population that is Black, we refer to the BVAP metric unless otherwise noted. *See Wright v. Sumter Cnty. Bd. of Elections & Registration*, 979 F.3d 1282, 1291 (11th Cir. 2020) (affirming Section 2 violation shown through maps drawn using BVAP).



did not do so, thereby preventing Black voters in Senate District 16 from forming a cohesive community to elect candidates of their choice.

Senate District 17 under the 2021 Senate Map includes parts of Henry, Newton, and Walton Counties in the southeastern Atlanta Metro area. Cooper ¶80. Henry County's Black population has increased by almost 75% in the last decade, and Newton County's has increased by more than 45%. *Id.* But the State drew Senate District 17 as under 34% Black, negating the ability of the growing Black community in that area to elect candidates of its choice. *Id.* It did so while packing Black voters in neighboring Senate Districts 10 (over 70% Black) and 43 (almost 65% Black), which include parts of neighboring Rockdale County, as well as parts of Henry and Newton Counties. Cooper ¶81. Rockdale County's Black voting age population similarly increased by 53% over the last decade, and the county is majority Black. Cooper ¶80. The State should have drawn a new Black-majority district here too, by "unpacking" some of the Black population in Senate Districts 10 and 43 across Rockdale County and "uncracking" the Black population in Senate District 17 in Henry and Newton Counties. Cooper ¶81. But it did not do so.

In addition, the State denied Black voters an opportunity to elect their preferred candidates in at least two House districts in the area in and around Spalding, Clayton, and Henry Counties, i.e., in and around the area where House

Districts 74 and 117 were drawn in the 2021 House Map (and in the same burgeoning south Atlanta Metro area where Senate Districts 16 and 17 were drawn in the 2021 Senate Map). The State should have “unpacked” the Black population in neighboring districts like House District 78 (71.5% Black) and 116 (over 58% Black) and “uncracked” the Black populations in House Districts 74, 117, and 134, which include Henry and Spalding Counties. Cooper ¶¶112-15. The State failed to draw these new Black-majority districts that would have allowed Black voters in these growing areas to elect candidates of choice.

## 2. *Augusta Area*

In the Augusta area, the State denied Black voters an opportunity to elect candidates of their choice in one State Senate district and at least one House district. Senate District 23 in the 2021 Senate Map lies near the city of Augusta in the “Black Belt” region, which historically had, and currently has, a large Black population. Cooper ¶¶16, 83; Ex. D, Burch Report (“Burch”) 29-33. Senate District 23 includes outlying portions of Richmond County, as well as a number of surrounding counties like Burke, Jefferson, Warren, and Taliaferro. Neighboring Senate Districts 22 and 26 include parts of adjacent Black Belt counties with significant and growing Black populations. Cooper ¶25. The region overall has seen recent increases in the Black voting age populations and a decline in the white population. Cooper ¶¶51, 82. The

State should have drawn a new Black-majority Senate district by “unpacking” the Black population in Senate Districts 22 and 26 and “uncracking” the Black population in Senate District 23, thereby achieving a more even distribution in the Augusta region. Cooper ¶¶83. Because it chose not to, Senate District 23 has a Black voting age population under 36%, preventing Black voters in this area of the historic Black Belt from joining adjacent cohesive communities to elect candidates of their choice. Cooper ¶¶82.

The State should have drawn a new Black-majority House district in and around Augusta in the Black Belt region that includes Baldwin, Wilkinson, and Taliaferro Counties. These counties have substantial populations of Black voters who are currently included in non-majority-Black districts under the 2021 House Map. Cooper ¶¶116-17. The State should have “unpacked” the Black populations in neighboring Black-majority districts like House Districts 129 and 130 (both in Augusta entirely within Richmond County), and House Districts 128, 131, and 132; and “uncracked” the Black population in, for example, District 133 (which includes parts of Baldwin County) and House District 155 (which includes Wilkinson County). Cooper ¶¶116-17. In sum, the Illustrative House Map draws six Black-majority districts where the 2021 Plan draws five. Cooper ¶¶117.

### 3. *Southwest Georgia*

The State denied Black voters an opportunity to elect candidates of their choice in at least one House district in the Black Belt in southwest Georgia. This area includes Dougherty, Mitchell, and Thomas Counties, where House Districts 171 and 173 in the 2021 House Map were drawn with Black populations under 40%. Cooper ¶118. The State’s maps should have “unpacked” the Black population in nearby House District 153 (which includes the city of Albany and was drawn with a Black population of nearly 70%), and “uncracked” the Black populations in House Districts 171 and 173. Cooper ¶¶118-19. Overall, the Illustrative Maps show that a total of seven majority-Black House districts can be drawn in the southwest Georgia Black Belt region, but the 2021 House Map contains only six. Cooper ¶120.

#### C. **The 2021 Maps Continue Georgia’s History of Subordinating Black Voters Like Plaintiffs**

The 2021 Maps, which functionally nullify the historic growth in Georgia’s Black population over the past decade, continue a long history of denying Black Georgians the full political rights afforded to white citizens. The VRA was written to remedy such wrongs. *McCain v. Lybrand*, 465 U.S. 236, 243-44 (1984). That sweeping national reform was enacted to reverse the systematic disenfranchisement of the Jim Crow era—a period that, in Georgia, saw poll taxes, whites-only primaries, literacy tests, grandfather clauses, blatant ballot box stuffing, and racially

motivated murder used to suppress the political power of Black citizens, *see generally* Ex. E, Ward Report (“Ward”) at 4-17—and usher in a new era of full political equality, *McCain*, 465 U.S. at 243-44. Congress made clear that “the purpose of the Voting Rights Act was not only to correct an active history of discrimination” in voting matters specifically, “but also to deal with the accumulation of discrimination” in other areas of life that have restricted Black political participation. *Thornburg v. Gingles*, 478 U.S. 30, 44-45 & n.9 (1986) (citation omitted).

Since its passage, the VRA has operated as a powerful tool for dismantling state and local policies that stymie political participation among racial minority groups. In particular, Section 2 of the VRA prohibits any redistricting scheme whereby members of a racial minority group “have less opportunity than other members of the electorate to participate in the political process and to elect representatives of their choice,” 52 U.S.C. § 10301(b), without any need to show discriminatory intent. *Gingles*, 478 U.S. at 71.<sup>4</sup> Section 2 prohibits districting

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<sup>4</sup> Section 5 of the VRA—prior to its functional termination by the Supreme Court in *Shelby County v. Holder*, 570 U.S. 529 (2013)—required states with the worst records of voting discrimination to obtain preclearance from the federal government to change any voting rules or processes. Georgia was designated as a covered jurisdiction subject to Section 5 preclearance, due to its long history of racially discriminatory practices and procedures in voting and elections.

schemes that result in vote dilution, i.e., when a cohesive minority population's voting strength is reduced, usually by "submerg[ing]" them in white majority areas and thereby impairing their ability to elect representatives of their choice. *Id.* at 68.

The 2021 Maps will dilute the votes of Black Georgians like Plaintiffs, who include individual voters from places like Henry and Fayette Counties in the Atlanta Metro area, Jefferson County near Augusta, and Thomas County in southwestern Georgia. *See* Exs. F-I. Plaintiffs also include the Nation's oldest Black fraternity, Alpha Phi Alpha, and one of the Nation's largest and oldest Black churches, the AME Church, whose members live in those affected areas. *See* Exs. J, K. These voters were drawn into white-majority districts under the 2021 Maps, but should have been included in additional majority-Black districts where they would have been able to join with other Black voters to elect candidates of their choice.

The Legislature's rushed 2021 redistricting process provided no real opportunity for Georgia's Black voters, like Plaintiffs, to meaningfully raise concerns with the 2021 Maps. Every town hall meeting convened by the State's Redistricting Committees was held *before* the August 2021 release of the key Census data that Georgia used to redraw districts, and well before any of the maps were even

proposed.<sup>5</sup> Less than two weeks after the 2021 Maps were released on November 2, 2021, the Legislature passed both largely on a party-line vote, and not a single legislator of color voted in favor.<sup>6</sup> Although a Section 2 claim does not require demonstrating discriminatory intent, the opaque and superficial process through which these maps were passed further undermines their legitimacy and illustrates the need for relief from this Court.

### **ARGUMENT**

A preliminary injunction shall issue if the moving party shows “(1) ... a substantial likelihood of success on the merits; (2) irreparable injury will be suffered unless the injunction issues; (3) the threatened injury to the movant outweighs whatever damage the proposed injunction may cause the opposing party; and (4) if issued, the injunction would not be adverse to the public interest.” *Siegel v. LePore*, 234 F.3d 1163, 1176 (11th Cir. 2000) (en banc).

All four factors strongly weigh in Plaintiffs’ favor. The maps violate Section 2 by diluting Black voting strength and undermining Black Georgians’ equal

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<sup>5</sup> See Georgia General Assembly, Meeting Archives, Senate Committee on Reapportionment and Redistricting, <https://www.legis.ga.gov/committees/senate/140> (last visited January 2, 2022).

<sup>6</sup> See Georgia General Assembly, Votes on S.B. 1EX, <https://www.legis.ga.gov/legislation/60894> (last visited January 2, 2022); Georgia General Assembly, Votes on H.B. 1EX, <https://www.legis.ga.gov/legislation/60897> (last visited January 2, 2022).

participation in the political process; and the State has no legitimate interest in conducting elections using unlawful maps. Accordingly, this Court should enjoin the State's 2021 Maps.

### **I. Plaintiffs Are Likely to Succeed on the Merits**

Plaintiffs can show that the State's 2021 Maps dilute the votes of Black Georgians in violation of Section 2 of the VRA. That analysis proceeds in two parts.

First, *Thornburg v. Gingles* sets forth three preconditions for determining whether a districting scheme may "impair minority voters' ability to elect representatives of their choice." 478 U.S. at 50-51; *see also* 52 U.S.C. § 10301(b); *Wright v. Sumter Cnty. Bd. of Elections & Registration (Wright II)*, 979 F.3d 1282 (11th Cir. 2020) (affirming finding of Section 2 violation). A plaintiff must first show that an affected racial minority group (here, Black voters) is "sufficiently large and geographically compact" to comprise a majority of the voting-age population in a district. *Gingles*, 478 U.S. at 50-51. Next, the racial minority group must be "politically cohesive," meaning group members tend to vote similarly. *Id.* at 51. A politically cohesive group of Black voters, for example, would be likely to elect Black-preferred candidates if drawn into a district with sufficient Black voting strength. *Id.* Finally, the racial majority group (typically, as here, white voters) must also vote as a bloc, such that Black-preferred candidates will typically be defeated



in the area under the challenged scheme. *Id.* In this Circuit, a plaintiff must also provide an illustrative remedial map to demonstrate that a remedy is feasible. *See, e.g., Wright II*, 979 F.3d at 1302. Plaintiffs satisfy these requirements.

After demonstrating the *Gingles* preconditions, Plaintiffs must show that, based on the totality of the circumstances, the 2021 Maps result in an unequal opportunity for minority voters to participate in the political process and to elect representatives of their choosing. *Ga. State Conf. of the NAACP v. Fayette Cnty. Bd. of Comm'rs*, 775 F.3d 1336, 1342 (11th Cir. 2015). It is “the very unusual case in which a plaintiff can establish the existence of the three *Gingles* factors but still have failed to establish a violation of § 2 under the totality of circumstances.” *Wright II*, 979 F.3d at 1304 (internal quotation marks omitted). In assessing the totality of the circumstances, courts consider a set of factors drawn from a Senate Judiciary Committee report accompanying the 1982 amendments to the VRA (the “Senate Factors”). *Id.* Courts “are not limited to considering solely these factors, and the factors are ‘neither comprehensive nor exclusive.’ Nor is there a requirement that ‘any particular number of factors be proved, or that a majority of them point one way or the other.’” *NAACP*, 775 F.3d at 1342 (quoting *Gingles*, 478 U.S. at 45). The ultimate inquiry is whether, in light of all relevant considerations, the challenged districting scheme dilutes Black voting strength and “results in an unequal

opportunity for [Black] voters to participate in the political process and to elect representatives of their choosing.” *Id.* As explained below, the balance of the Senate Factors weighs heavily in Plaintiffs’ favor, too.

**A. Plaintiffs Satisfy The *Gingles* Preconditions**

**1. Gingles Precondition 1: At Least Seven Additional, Reasonably Compact Black-Majority Districts Can Be Drawn**

“In a district line-drawing challenge, ‘the first *Gingles* condition requires the possibility of creating more than the existing number of reasonably compact districts with a sufficiently large minority population to elect candidates of its choice.’” *League of United Latin Am. Citizens (LULAC) v. Perry*, 548 U.S. 399, 402 (2006). This requirement is satisfied where plaintiffs show that at least one additional reasonably compact, majority-Black district could be drawn beyond the number in the challenged map. *See Wright II*, 979 F.3d at 1304 (challenged map had two Black-majority districts, plaintiff’s map featured three); *Ga. State Conf. of the NAACP v. Fayette Cnty. Bd. of Comm’rs*, 118 F. Supp. 3d 1338, 1343 (N.D. Ga. 2015) (granting preliminary injunction when illustrative map included additional majority-minority district). Courts assess compactness using a variety of metrics, including the “Reock” test, which compares the area in each district to a circle and assigns a value between zero and one, with one being the most compact. *Wright II*, 979 F.3d at 1308.

Here, expert demographer William Cooper’s Illustrative Maps create

additional, reasonably compact, and majority-Black districts beyond those drawn by the State. *See* Cooper ¶¶7-8. As relevant here, the Illustrative Maps show that Georgia’s Black population is sufficiently numerous and geographically compact to support at least three additional Senate districts that the State failed to draw, and at least four House districts that the State failed to draw, in the areas discussed *supra* 6-10. *See* Cooper ¶¶71, 106. The Illustrative Maps’ Reock scores are in the same range of average compactness as the 2021 Maps. *See* Cooper ¶¶84-85, 121-23; Cooper Ex. S.<sup>7</sup> They also follow traditional redistricting principles, such as population equality, contiguity, maintaining political and geographical boundaries, protection of incumbents, and maintaining communities of interest. *See* Cooper ¶¶84-89, 121-28; *see also Davis v. Chiles*, 139 F.3d 1414, 1425 (11th Cir. 1998) (compactness found when proposed district is “consistent with traditional districting principles”).<sup>8</sup>

Moreover, the majority-Black districts in the Illustrative Maps would give Black voters in the challenged House and Senate Districts the ability to elect

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<sup>7</sup> Proposed districts do not need to have higher compactness scores than challenged districts in order to be sufficiently compact under *Gingles*. *See, e.g., Covington v. North Carolina*, No. 1:15-CV-399, 2017 U.S. Dist. LEXIS 198313, at \*36-40 (M.D.N.C. Dec. 1, 2017); *Mo. State Conf. of the NAACP v. Ferguson-Florissant Sch. Dist.*, 201 F. Supp. 3d 1006, 1030 (E.D. Mo. 2016).

<sup>8</sup> Notably, these same principles were enumerated in the Legislature’s redistricting guidelines prior to enacting the 2021 Maps. *See* Exs. L, M.

candidates of their choice, *see* Handley 12-13, and thus constitute a “proper remedy” for a VRA violation. *Wright II*, 979 F.3d at 1302.<sup>9</sup> Plaintiffs are therefore substantially likely to satisfy the first *Gingles* precondition.

**2. *Gingles* Precondition 2: Black Communities Are Politically Cohesive in Those Areas Where the State Could Have Drawn Additional Black-Majority Senate and House Districts**

The second *Gingles* precondition requires the protected group be “politically cohesive,” which plaintiffs often demonstrate by “showing that a significant number of minority group members usually vote for the same candidates.” *Gingles*, 478 U.S. at 51, 56. Courts have repeatedly found Georgia’s Black communities to be politically cohesive.<sup>10</sup> This case is no different.

Dr. Lisa Handley analyzed the connection between race, voting, and election

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<sup>9</sup> In each of the Illustrative Districts subject to this motion, the Black-preferred candidate would have won statewide elections between 2018 and 2020 with an average of 66.1% of the vote in House District 73, 56.1% in House District 110, 53.5% in House District 144, and 53.8% in House District 153; and with at least 63.5% of the vote in Senate District 17, 51.9% in Senate District 23, and 59.2% in Senate District 28. *See* Handley 14-20.

<sup>10</sup> *See, e.g., Wright II*, 979 F.3d at 1304 (“[B]lack voters in Sumter County were ‘highly cohesive’” because in most elections “the overwhelming majority of African Americans voted for the same candidate”); *Askew v. City of Rome*, 127 F.3d 1355, 1377 (11th Cir. 1997) (observing that “both empirical and anecdotal evidence indicate that Rome[, Georgia’s] black community is ‘cohesive,’” in large part because “[t]he black community consistently ranks black candidates as their favorite candidates”); *Ga. State Conf. of the NAACP v. Georgia*, 312 F. Supp. 3d 1357, 1360 (N.D. Ga. 2018) (“[V]oting in Georgia is highly racially polarized.”).

outcomes in the geographic areas where the Illustrative Maps draw additional Black-majority districts beyond the 2021 Senate and House Maps. *See generally* Handley 5-7. Dr. Handley used official data from 2016, 2018, and 2020 statewide election contests and 2020 Census data, and then employed three statistical techniques to estimate voting patterns: homogeneous precinct analysis, ecological regression, and ecological inference. Handley 2-4.<sup>11</sup> Dr. Handley then analyzed the five recent statewide election contests that included Black candidates, as well as the two U.S. Senate contests in which Jon Ossoff ran. Handley 5 n.4. In addition, Dr. Handley analyzed state legislative contests that included Black candidates. Handley 7.<sup>12</sup>

Dr. Handley's analysis demonstrates that the communities of Black voters in the areas where the State failed to draw additional Black-majority districts are politically cohesive. Black voters in these areas almost always vote for the same candidates, including in all of the recent general elections Dr. Handley analyzed.

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<sup>11</sup> Courts have relied on all three methods and ecological inference has been called the “gold standard” for racially polarized voting analysis. *Wright v. Sumter Cnty. Bd. of Elections (Wright I)*, 301 F. Supp. 3d 1297, 1305 (M.D. Ga. 2018), *aff'd*, 979 F.3d 1282 (11th Cir. 2020).

<sup>12</sup> Dr. Handley properly relies on data from both elections involving the districts at issue (endogenous elections) and elections outside those districts (exogenous elections). *See, e.g., Wright II*, 979 F.3d at 1290-91, 1304; *Johnson v. Hamrick*, 296 F.3d 1065, 1077 & n.3 (11th Cir. 2002). Because courts have “read *Gingles* to allow flexibility in the face of sparse data,” they have found exogenous data to be particularly probative when endogenous election data is sparse. *See Westwego Citizens for Better Gov't v. Westwego*, 872 F.2d 1201, 1209 n.11 (5th Cir. 1989).

Handley 7. That kind of “[b]loc voting by blacks tends to prove that the black community is politically cohesive” within the meaning of the second precondition. *Gingles*, 478 U.S. at 68. Indeed, Dr. Handley’s analysis shows that in the seven statewide general elections examined, Black voters overwhelmingly supported a single preferred candidate—the average percentage of the Black vote received by the candidate of choice in these areas was between 65.3% and 99.6%. Handley app. A.<sup>13</sup> Further, each of the 24 biracial state legislative elections Dr. Handley analyzed were extremely racially polarized.<sup>14</sup> In all but one race, over 95% of Black voters supported the same candidate, a candidate who on average secured the support of less than 5% of white voters in Senate races and less than 9.5% of white voters in House races. Handley 7 & app. B. “[S]howing that a significant number of minority group members usually vote for the same candidates,” as happened here across dozens of races over numerous years, suffices to satisfy the second *Gingles* precondition. *Gingles*, 478 U.S. at 56.

### **3. *Gingles* Precondition 3: Blocs of White Voters Prevent the Election of Black-Preferred Candidates in Those Areas Where the State**

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<sup>13</sup> These percentages refer to the ecological inference estimates in Appendix A of Dr. Handley’s expert report.

<sup>14</sup> Courts may—as Dr. Handley has—“accord extra weight to campaigns involving minority candidates.” *Hamrick*, 296 F.3d at 1078. In addition, because the third precondition is concerned with “larger trends,” “a pattern of racial bloc voting that extends over a period of time”—which Dr. Handley has identified in the areas in question—“is more probative.” *Id.* at 1074 (quoting *Gingles*, 478 U.S. at 57).

### **Could Have Drawn Black-Majority Senate and House Districts**

Under the third *Gingles* precondition, a racial “minority must be able to demonstrate that the white majority votes sufficiently as a bloc to enable it—in the absence of special circumstances, such as the minority candidate running unopposed—usually to defeat the minority’s preferred candidate.” 478 U.S. at 51 (citations omitted). In Georgia, white voters typically support the same candidate, and that bloc is usually large enough to defeat Black-preferred candidates for General Assembly.<sup>15</sup> Here, blocs of white voters in the areas where the State failed to draw additional Black-majority districts usually defeat the Black-preferred candidate, particularly in General Assembly elections involving Black candidates, which are the most probative under the third precondition. *Wright I*, 301 F.Supp.3d at 1314-18.

To determine the presence of decisive white bloc voting in the areas at issue here, Dr. Handley conducted multiple analyses. For one, she examined elections in certain prior plan districts that overlap with the Black-majority districts the State

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<sup>15</sup> See, e.g., *Wright II*, 979 F.3d at 1304 (third precondition met when in the “most probative” elections in Sumter County, “white residents voted as a bloc to defeat the black-preferred candidate”); *NAACP*, 775 F.3d at 1340 (observing that because “non-African-American voters preferr[ed] white candidates” “no African-American candidates had ever been elected” to the offices in question); *Hall v. Holder*, 117 F.3d 1222, 1229 (11th Cir. 1997) (“Racial bloc voting by the white majority usually suffices to keep black citizens out of office.”).

should have drawn (and that Plaintiffs' Illustrative Maps do draw). *See* Handley 8-13. Her analysis shows that white bloc voting in these areas has usually defeated Black-preferred candidates in the past. Specifically:

*Eastern Atlanta Metro Region:* In and around Illustrative Senate District 17, white voters consistently joined together to defeat Black-preferred candidates. For example, prior Senate District 17, which substantially overlaps with Illustrative Senate District 17 in Henry County, elected candidates in 2016, 2018, and 2020 supported by nearly all white voters and essentially no Black voters. Handley 6, 9.

*Southern Atlanta Metro Region:* In and around Illustrative Senate District 28, white voters consistently joined together to defeat Black-preferred candidates. For example, in the 2020 election in prior Senate District 16, which overlaps with Illustrative District 28 in Fayette and Spalding Counties, 90% of white voters supported the victorious candidate while over 90% of Black voters supported the unsuccessful one. Handley 6, 10. The white-preferred candidate in prior District 16 also won in a racially polarized election in 2018. Handley 9 n.10.

*Black Belt Near Augusta:* In and around Illustrative Senate District 23, white voters consistently joined together to defeat Black-preferred candidates. In the only recent contested election in prior Senate District 23, which overlaps with Illustrative District 23 in Burke and Jefferson Counties, among others, over 90% of white voters



supported the victorious white candidate, and Black voters overwhelmingly supported the losing Black candidate. Handley 6, 10.

*Southeastern Atlanta Metro Region:* In and around Illustrative House Districts 73 and 110, white voters consistently joined together to defeat Black-preferred candidates. In the two recent contested elections in prior House District 73—which overlaps with Illustrative District 73 in Spalding and Henry Counties—the white-preferred candidate defeated the Black-preferred candidate in racially polarized elections. Handley 6, 10 & n.11. Notably, a Black candidate lost the 2016 election despite garnering nearly all of the Black vote because a sufficient number of white voters coalesced around another candidate. Handley 10. Similarly, in prior House District 130—which substantially overlaps with Illustrative District 110 in another portion of Spalding and Henry Counties—the only recent contested election occurred in 2020, and white voters overwhelmingly supported the winner; Black voters overwhelmingly supported the losing Black candidate. Handley 10.

*Central Georgia:* In and around Illustrative House District 144, white voters consistently joined together to defeat Black-preferred candidates. In the last two contested elections in prior District 145, which overlaps with Illustrative District 144 in Baldwin County, the Black candidate lost to the white-preferred candidate despite overwhelming support from Black voters. Handley 7, 10-11.

*Southwest Georgia:* In and around Illustrative House District 153, white voters consistently joined together to defeat Black-preferred candidates. For example, in prior District 173, which overlaps with Illustrative House District 153 in Mitchell County, blocs of white voters defeated Black candidates preferred by upwards of 96% of Black voters in 2016 and 2020. Handley 7 app. B. In both races, the white-preferred, winning candidates secured more than 90% of the white vote.<sup>16</sup>

Second, Dr. Handley also conducted a recompiled district analysis to analyze if the overlapping districts in the same areas of interest from the 2021 Maps would provide Black voters an opportunity to elect their candidates of choice.<sup>17</sup> See Handley 11-13. That analysis showed that the relevant districts in the 2021 Maps—such as Senate District 17 and House Districts 74 and 117 in south Metro Atlanta, Senate District 23 in the Augusta area, and House District 171 in Southwest Georgia—will not perform for Black voters as the State drew them. Handley 14-20.

In other words: Blocs of white voters usually defeated Black-preferred

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<sup>16</sup> Statewide races further support these conclusions; in all but the extraordinary circumstances of the most recent elections—which determined control of the U.S. Senate and were conducted during a global pandemic—white and Black voters overwhelmingly supported different candidates, and white voters coalesced in sufficient numbers to elect their preference. Handley app. A.

<sup>17</sup> Recompiled district analysis applies the boundaries of a new or hypothetical district (here, those drawn in the 2021 Maps) to past election results, in order to analyze the election performance of the new district. See Handley 11.

candidates in the prior plan districts located in the areas of interest here, and blocs of white voters will continue usually to defeat Black-preferred candidates in the corresponding districts under the 2021 Maps. Yet the State could and should have drawn Black-Majority districts in those same areas, allowing tens of thousands more Black voters to elect candidates of their choice rather than being swamped by white bloc voting. Plaintiffs are substantially likely to establish the third *Gingles* precondition.

#### **4. Plaintiffs’ Remedial Maps Prove That a Remedy Is Feasible**

Plaintiffs must also “demonstrate the existence of a proper remedy,” and are substantially likely to do so here. *Wright II*, 979 F.3d at 1302 (citation omitted). Plaintiffs’ Illustrative Maps feature seven additional Black-majority Senate and House Districts. These maps accurately reflect the growth of the Black voting age population in Georgia and would remedy the unlawful vote dilution caused by the 2021 Maps. Cooper ¶¶71, 106, Exhibit N-1, Exhibit Z-1.

#### **B. Plaintiffs Will Prove That The Challenged Maps Dilute Black Voting Strength**

The State’s failure to draw additional Black-majority districts denies Black Georgians like Plaintiffs and those they represent the ability to elect candidates of their choice—a conclusion supported by the balance of the relevant Senate Factors

that weigh heavily in Plaintiffs’ favor. *LULAC*, 548 U.S. at 425-26.<sup>18</sup> Based on a “[s]earching practical evaluation of the past and present reality,” and a “‘functional’ view of the political process,” *Gingles*, 478 U.S. at 45 (citation omitted), Black Georgians in the areas in and around the challenged districts “have less opportunity than other members of the electorate to participate in the political process and to elect representatives of their choice,” *LULAC*, 548 U.S. at 425.

### **1. Georgia Has a Long History of State-Sanctioned Discrimination and Political Violence Against Black Voters**

Senate Factor One recognizes that a history of discrimination and the accumulation of such discrimination has resulted in continued “diminished political influence and opportunity” for Black citizens, supporting a finding of a VRA violation. *Cofield v. City of LaGrange*, 969 F. Supp. 749, 757 (N.D. Ga. 1997). That Georgia weaponized the law against Black voters since the end of slavery is indisputable; this history “has been rehashed so many times that the Court can all but take judicial notice thereof.” *Wright I*, 301 F. Supp. 3d at 1310 (quoting *Brooks v. State Bd. of Elections*, 848 F. Supp. 1548, 1560 (S.D. Ga. 1994)). For decades, Georgia instituted mechanisms to dilute the voting power of Black Georgians—including well after the passage of the VRA. *See, e.g.*, Ward 7, 8, 11, 15-16; *See*

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<sup>18</sup> Senate Factor 4—the exclusion of members of the minority group from candidate slating processes—does not apply to the claims raised by Plaintiffs.

Ex. C, Jones Report (“Jones”) 9-12; *Georgia v. United States*, 411 U.S. 526 (1973); *Busbee v. Smith*, 549 F. Supp. 494, 499-500 (D.D.C. 1982), *aff’d mem.* 459 U.S. 1166 (1983). These *de jure* political restrictions were accompanied by constant political violence as a tool to cement white dominance in the political arena. An organized campaign of violence and intimidation involving massacres, assassinations, lynching, and arson prevented and discouraged Black voters from participating in the political process at least until the 1960s. *See* Ward 4-17.

## **2. Voting in Georgia Is Highly Racially Polarized**

The second Senate Factor recognizes that in an environment characterized by racially polarized voting, politicians can manipulate elections to “minimize or cancel out [minority voters’] ability to elect their preferred candidates.” *United States v. McGregor*, 824 F. Supp. 2d 1339, 1346 (M.D. Ala. 2011) (quoting *Gingles*, 478 U.S. at 48). As discussed above, courts in this Circuit have repeatedly recognized the high degree of racially polarized voting in Georgia. *See supra* 18 n.10. Racially polarized voting was apparent in the 2020 U.S. Senate general elections, the 2021 U.S. Senate runoff elections, the 2018 gubernatorial race, and the 2018 contests for Commissioner of Insurance and School Superintendent. *See* Handley app. A; *supra* 20. Moreover, the chair of the Senate committee who drew the 2021 Senate Map conceded, “based on the pattern of Georgia, that we do have racially polarized voting

in Georgia.”<sup>19</sup>

### **3. Georgia Uses Practices or Procedures That Undercut Black Voters’ Ability to Participate in Politics and Elect Candidates of Choice**

Under the third Senate Factor, voting practices and procedures “that have discriminatory results [and] perpetuate the effects of past purposeful discrimination,” S. Rep. at 40, support a VRA violation. In recent election cycles, Georgia officials have purged millions of voters from voter rolls, closed precincts in Black-majority districts, imposed at-large voting systems for local government and school board elections, and implemented other practices and procedures that dilute Black Georgians’ voting power. *See* Jones 9-27.<sup>20</sup> Additionally, recently enacted S.B. 202 contains several pernicious provisions that demonstrate it is yet another

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<sup>19</sup> November 4, 2021 Meeting of Senate Committee on Reapportionment & Redistricting, Hearing on S.B. 1EX, 2021 Leg., 1st Special Sess. (2021) (statement of Senator John F. Kennedy, Chairman, S. Comm. Reapp. & Redis. at 1:00:44 – 1:01:01), <https://tinyurl.com/mu8v4sf6>.

<sup>20</sup> *See also, e.g., NAACP*, 950 F. Supp. 2d at 1316 (numbered posts, residency requirements, staggered terms, and majority vote requirement impaired Black candidates’ potential for electoral success), *aff’d in part, vacated in part, rev’d in part*, 775 F.3d 1336, 1343–44 (11th Cir. 2015); *Solomon v. Liberty Cnty. Comm’rs*, 221 F.3d 1218, 1222, 1235 (11th Cir. 2000) (en banc) (“the majority vote requirement ... can enhance the possibility of discrimination against black voters in Liberty County”); *United States v. Marengo Cnty. Comm’n*, 731 F.2d 1546, 1570 (11th Cir. 1984) (short window of hours for voters to register, Board of Registrars meeting only in county seat, and not in more rural areas, and having few Black poll officials and spurning offers of Black voters to serve as deputy registrars, “unquestionably discriminated” against Black voters).

installment in Georgia's long history of devices impairing the franchise.<sup>21</sup>

#### **4. Black Georgians Face a Severe Burden of Discrimination and Disparities in Related Spheres of Life**

The fifth Senate Factor recognizes that disparities in education, employment, and other related areas of life that arise from past discrimination depress minority political participation and hinder minorities' ability to participate effectively in the political process. *See, e.g., White v. Regester*, 412 U.S. 755, 768 (1973); S. Rep. at 29 n.114. Black Georgians bear the effects of centuries of discrimination and inequality not only in the electoral process but in countless other areas of life. Black Georgians have poverty rates more than double those of non-Hispanic whites,<sup>22</sup> and suffer disparities in health access and outcomes,<sup>23</sup> involuntary residential mobility,<sup>24</sup> and employment.<sup>25</sup> Black Georgians also face continued segregated and unequal education,<sup>26</sup> discrimination in housing and lending and residential segregation,<sup>27</sup> and

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<sup>21</sup> *See, e.g.,* Nick Corasaniti & Reid J. Epstein, *What Georgia's Voting Law Really Does*, N.Y. Times (Apr. 2, 2021), [shorturl.at/irAMS](https://www.nytimes.com/2021/04/02/us/politics/georgia-voting-law.html); Erica Thomas, *Georgia's New Voting Restrictions Are a Step Back Into Our State's Dark History*, Time (Mar. 31, 2021, 4:50 PM), [shorturl.at/bduE9](https://www.time.com/2021/03/31/georgia-voting-restrictions/).

<sup>22</sup> *See* Burch at 11-12.

<sup>23</sup> *See* Burch at 23-25.

<sup>24</sup> *See* Burch at 13-14.

<sup>25</sup> *See* Burch at 11-13.

<sup>26</sup> *See* Burch at 8-10.

<sup>27</sup> *See* Burch at 13-23.

disproportionate treatment in the criminal justice system.<sup>28</sup> These disparities result from policy choices, such as school segregation and redlining, intended to deprive Black Georgians of the benefits accorded to whites. Burch 9 n.1, 20-23. This “clear evidence of present socioeconomic or political disadvantage resulting from past discrimination” means Plaintiffs need not prove their disparities reduce political participation, *Marengo Cnty. Comm’n*, 731 F.2d at 1568-69, but there is robust evidence that they interfere with political participation. *See* Burch 5-6.

### **5. Racial Appeals Are Used by Political Campaigns in Georgia**

Under Senate Factor Six, the persistence of political campaigns characterized by overt or subtle racial appeals impairs the ability of Black voters to participate equally in the political process. *Gingles*, 478 U.S. at 80. Racial appeals in Georgia politics did not die in the Jim Crow era—they feature in recent elections and evoke the same rhetoric used to support disenfranchisement in the past. *See* Ward 19-21. For example, in 2005, State Representative Sue Burmeister complained that Black voters in her district’s Black-majority precincts only showed up at the polls when they were “paid to vote.” Ward 19. This rhetoric—aimed at delegitimizing the Black vote—resembles racist language from over a century ago.<sup>29</sup> In 2009, Nathan Deal, a

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<sup>28</sup> *See* Burch at 25-28.

<sup>29</sup> *See* Ward at 6 (describing 1888 speech referring to Black Georgians as “a vast mass of impulsive, ignorant, and purchasable votes” as white supremacist rhetoric).



former Congressman who was elected Governor in 2010, ridiculed criticism of voter identification as “the complaints of ghetto grandmothers who didn’t have birth certificates.” Ward 19. These are but two examples demonstrating that the use of racial appeals to influence voter behavior continues. *See generally* Jones 27-31.

## **6. Georgia’s State Government Lacks Black Representation**

Senate Factor Seven concerns the extent to which Black candidates are elected to public office, which “contextualizes the degree to which vestiges of discrimination continue to reduce [Black] participation in the political process.” *Veasey v. Abbott*, 830 F.3d 216, 261 (5th Cir. 2016) (en banc). Black candidates have historically struggled to win elections in Georgia state government. *See* Jones 32-34. Georgia has never had a Black governor or lieutenant governor, and only two Black candidates have been elected to non-judicial statewide office in Georgia’s 233-year history. Jones 32. Moreover, the specific areas in which the Illustrative Maps draw new Black-majority districts have largely failed to elect Black General Assembly candidates going back at least 15 years. *See* Jones 35-38. Such area and office-specific evidence is especially powerful. *See Wright II*, 979 F.3d at 1305-06.

## **7. Elected Officials Are Unresponsive to the Concerns of Black Georgians**

The unresponsiveness of elected officials to Black voters’ needs sheds light on the extent to which Black voters are denied access to the political process.

*Gingles*, 478 U.S. at 45; S. Rep. at 29. The persistent disparities in socioeconomic status, health outcomes, and felony disenfranchisement in Georgia demonstrate the lack of responsiveness of public officials to the particularized public policy needs of Black Georgians. *See* Burch 5, 28. Consistent with these policy shortcomings, Black Georgians are on average less satisfied with their public officials, the direction of the State, and the quality of services they receive than are white Georgians. *See* Burch 5, 28. A recent example of disregarding Black Georgians' concerns is the passage—without the support of a single Black legislator—of S.B. 202 in March 2021. S.B. 202 controversially instituted, among other things, radical changes to election administration in counties with large Black communities. It was unanimously decried by civil rights groups, civic institutions serving the Black community, and political leaders of the Black community as an unwarranted burden on the right to vote that will disproportionately fall upon Black voters. The passage of S.B. 202 is a notable example that elected officials will continue to ignore the concerns of Black Georgians.

#### **8. The Legislature's Justification for the Enacted Maps Is Tenuous**

Under the ninth Senate Factor, demonstration of a tenuous justification for a voting policy or procedure supports a finding of a VRA violation. *Gingles*, 478 U.S. at 45; S. Rep. at 29. Here, the November 4, 2021 Senate hearings exposed the

tenuousness of the Legislature’s rationale for the 2021 Maps. Asked to justify the makeup of their proposed districts, the chair of the Senate committee who drew the 2021 Senate Map described Black-majority districts as “VRA district[s]” and stated that if a district was previously a “VRA district,” then they “maintained it” as a VRA district.<sup>30</sup> Said otherwise, regardless of the massive growth of the Black voting age population, the General Assembly drew new maps intending only to maintain existing majority-minority districts. Despite awareness of the maps’ shortcomings, the Redistricting Committees jammed them through the legislative process within days, without considering alternatives, and did not allow the public to meaningfully review and comment on the proposed maps.<sup>31</sup>

## **II. Plaintiffs Will Suffer Irreparable Injury Without Injunctive Relief**

Because the 2021 Maps dilute the voting strength of Black Georgians in violation of the VRA, Plaintiffs will be harmed in the absence of injunctive relief. *See NAACP*, 118 F. Supp. 3d at 1347-48. Such injury is irreparable because “it cannot be undone through monetary remedies,” *Scott v. Roberts*, 612 F.3d 1279, 1295 (11th Cir. 2010) (citation omitted), and courts in this Circuit have repeatedly

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<sup>30</sup> *See supra* 28 n.19 (statements of Senator John F. Kennedy, Chairman, S. Comm. Reapp. & Redis. at 30:17–30:28; 31:57–32:12; 35:42–36:31; 36:59–37:09; 37:45–37:59; 38:10–38:40; 42:06–42:18).

<sup>31</sup> *See supra* 12-13.

found that conducting elections that would infringe voting rights results in irreparable injury.<sup>32</sup> Here too, Plaintiffs will suffer irreparable harm if elections are conducted pursuant to the 2021 Maps because those schemes dilute Black Georgians' votes in violation of the VRA. No amount of money can undo the harm caused by vote dilution. *See NAACP*, 118 F. Supp. 3d at 1347-48 (“Given the fundamental nature of the right to vote, monetary remedies would obviously be inadequate in this case; it is simply not possible to pay someone for having been denied a right of this importance.”).

### **III. The Balance of Hardships Favors Issuing a Preliminary Injunction**

Conducting the 2022 elections using the unlawful 2021 Maps would irreparably harm Plaintiffs, outweighing any burden an injunction might impose upon the Defendant. The requested injunction would not necessarily require the Defendant to postpone the dates of the 2022 primary election, let alone the general election. Primary elections will occur on May 24, with the general election scheduled for November 8. These elections are months away, which is sufficient time to implement a new map. Only the March 11 deadline for candidates to qualify for the

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<sup>32</sup> *See, e.g., Crumly v. Cobb Cnty. Bd. of Elections & Voter Registration*, 892 F. Supp. 2d 1333, 1344 (N.D. Ga. 2012); *Charles H. Wesley Educ. Found. v. Cox*, 324 F. Supp. 2d 1358, 1368 (N.D. Ga. 2004); *aff'd*, 408 F.3d 1349 (11th Cir. 2005); *accord Adamson v. Clayton Cnty. Elections & Registration Bd.*, 876 F. Supp. 2d 1347, 1358 (N.D. Ga. 2012).

primary and general elections may require alteration. But as this Court has recognized in a similar case, any “additional effort” the State must expend to implement a new map is outweighed by harm to the fundamental right to vote. *NAACP*, 118 F. Supp. 3d at 1348. Further, any administrative burdens that the State may claim will result from an injunction “cannot begin to compare with the further denial of [Plaintiffs’] right[] to full and equal political participation.” *Dillard*, 640 F. Supp. at 1363.

Nor would implementing maps be “impossible or unduly burdensome” for the State. *Id.* The 2021 Maps were passed in less than two weeks, and the General Assembly is set to reconvene on January 10, 2022. It can easily expedite the process by consulting or adopting the Plaintiffs’ Illustrative Maps.

#### **IV. Injunctive Relief is in the Public Interest**

“Where, as here, Plaintiffs have established a substantial likelihood of success on the merits,” courts have repeatedly held that “the public interest is best served by ... ensuring that all citizens ... have an equal opportunity to elect the representatives of their choice.” *NAACP*, 118 F. Supp. 3d at 1348-49. Enjoining the unlawful 2021 Maps would protect that equal opportunity.

## CONCLUSION

For these reasons, the Court should grant Plaintiffs' renewed motion for a preliminary injunction and enjoin Defendant from holding elections using the 2021 Maps.

This 13th day of January, 2022.

Respectfully submitted,

/s/ Sean J. Young

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**CERTIFICATE OF COMPLIANCE WITH LOCAL RULE 5.1**

The undersigned hereby certifies that the foregoing document has been prepared in accordance with the font type and margin requirements of Local Rule 5.1 of the Northern District of Georgia, using a font type of Times New Roman and a point size of 14.

/s/ Rahul Garabady

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**CERTIFICATE OF SERVICE**

I hereby certify that I have this day caused to be served the foregoing *Plaintiffs' Memorandum of Law in Support of Their Renewed Motion for a Preliminary Injunction* with the Clerk of Court using the CM/ECF system, which will automatically send email notification of such filing to all counsel or parties of record on the service list:

This 13th day of January, 2022.

/s/ Rahul Garabadu

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**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

ALPHA PHI ALPHA FRATERNITY  
INC., a nonprofit organization on  
behalf of members residing in Georgia;  
SIXTH DISTRICT OF THE  
AFRICAN METHODIST  
EPISCOPAL CHURCH, a Georgia  
nonprofit organization; ERIC T.  
WOODS; KATIE BAILEY GLENN;  
PHIL BROWN; JANICE STEWART,

*Plaintiffs,*

vs.

BRAD RAFFENSPERGER, in his  
official capacity as Secretary of State  
of Georgia.

*Defendant.*

**Case No. 1:21-CV-05337-SCJ**

**DECLARATION OF EDWARD WILLIAMS, ESQ.  
IN SUPPORT OF PLAINTIFFS' RENEWED MOTION  
FOR A PRELIMINARY INJUNCTION**

I, Edward Williams, declare as follows:

1. I am an attorney at the law firm Wilmer Cutler Pickering Hale and Dorr, LLP, counsel for Plaintiffs ALPHA PHI ALPHA FRATERNITY, INC., SIXTH DISTRICT OF THE AFRICAN METHODIST EPISCOPAL CHURCH, ERIC T.

WOODS, KATIE BAILEY GLENN, PHIL BROWN, and JANICE STEWART (collectively, “Plaintiffs”) in the above-captioned matter.

2. I submit this declaration in support of Plaintiffs’ Renewed Motion for Preliminary Injunction.

3. Attached hereto as Exhibit A is a true and correct copy of the Report of William S. Cooper and supporting exhibits.

4. Attached hereto as Exhibit B is a true and correct copy of the Report of Dr. Lisa Handley and supporting appendices.

5. Attached hereto as Exhibit C is a true and correct copy of the Report of Dr. Adrienne Jones and supporting exhibits.

6. Attached hereto as Exhibit D is a true and correct copy of the Report of Dr. Traci Burch.

7. Attached hereto as Exhibit E is a true and correct copy of the Report of Dr. Jason Morgan Ward.

8. Attached hereto as Exhibit F is a true and correct copy of the Declaration of Katie Bailey Glenn.

9. Attached hereto as Exhibit G is a true and correct copy of the Declaration of Phil S. Brown.

10. Attached hereto as Exhibit H is a true and correct copy of the Declaration of Janice Stewart.

11. Attached hereto as Exhibit I is a true and correct copy of the Declaration of Eric Woods.

12. Attached hereto as Exhibit J is a true and correct copy of the Declaration of Sherman Lofton, Jr. on behalf of Alpha Phi Alpha Fraternity Inc.

13. Attached hereto as Exhibit K is a true and correct copy of the Declaration of Bishop Reginald T. Jackson on behalf of the Sixth District of the African Methodist Episcopal Church.

14. Attached hereto as Exhibit L is a true and correct copy of the 2021-2022 Guidelines for the House Legislative and Congressional Reapportionment Committee.

15. Attached hereto as Exhibit M is a true and correct copy of the 2021 Guidelines for the Senate Redistricting Committee.

I declare under penalty of perjury that the foregoing is true and correct.

/s/ Edward Williams  
Edward Williams

Executed on January 13, 2022 in Washington, D.C.

**CERTIFICATE OF COMPLIANCE WITH LOCAL RULE 5.1**

The undersigned hereby certifies that the foregoing document has been prepared in accordance with the font type and margin requirements of Local Rule 5.1 of the Northern District of Georgia, using a font type of Times New Roman and a point size of 14.

/s/ Rahul Garabady

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# **EXHIBIT A**

## **Part 1**

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**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

ALPHA PHI ALPHA FRATERNITY  
INC., et al.,

*Plaintiffs,*

vs.

BRAD RAFFENSPERGER, in his  
official capacity as Secretary of State of  
Georgia.

*Defendant.*

Civ. No. 21-5337

**DECLARATION OF WILLIAM S. COOPER**

WILLIAM S. COOPER, acting in accordance with 28 U.S.C. § 1746,  
Federal Rule of Civil Procedure 26(a)(2)(B), and Federal Rules of Evidence 702  
and 703, does hereby declare and say:

**I. INTRODUCTION**

1. My name is William S. Cooper. I have a B.A. in Economics from Davidson College. As a private consultant, I serve as a demographic and redistricting expert for the Plaintiffs.

2. I have testified at trial as an expert witness on redistricting and demographics in federal courts in about 45 voting rights cases since the late 1980s. Over 25 of the cases led to changes in local election district plans. Five of the cases

resulted in changes to statewide legislative boundaries: *Rural West Tennessee African-American Affairs Council, Inc. v. McWherter*, No. 92-cv-2407 (W.D. Tenn. 1995); *Old Person v. Brown*, No. 96-cv-0004 (D. Mont. 2002); *Bone Shirt v. Hazeltine*, No. 01-cv-3032 (D.S.D. 2004); *Alabama Legislative Black Caucus v. Alabama*, No. 12-cv-691 (M.D. Ala. 2017), and *Thomas v. Reeves* (S.D. Miss. 2019). In *Bone Shirt v. Hazeltine*, the court adopted the remedial plan I developed.

3. I served as the *Gingles* 1 expert for two post-2010 local-level Section 2 cases in Georgia, *NAACP v. Fayette County* and *NAACP v. Emanuel County*. In both cases, the parties settled on redistricting plans that I developed (with input from the respective defendants). In the latter part of the decade, I served as the *Gingles* 1 expert in three additional Section 2 cases in Georgia, which were all voluntarily dismissed after the 2018 elections: *Georgia NAACP v. Gwinnett County*, No. 1:16-cv-02852-AT; *Thompson v. Kemp*, No. 1:17-cv-01427 (N.D. Ga. 2018); and *Dwight v. Kemp*, No. 1:18-cv-2869 (N.D. Ga. 2018).

4. My redistricting experience is further documented in my curriculum vitae, which is attached as **Exhibit A**.



### **A. Purpose of Declaration**

5. The attorneys for the Plaintiffs in this case asked me to determine whether the African-American<sup>1</sup> population in Georgia is “sufficiently large and geographically compact” to allow for the creation, employing traditional districting principles, of additional majority-Black Senate and House districts beyond those created in the legislative plans that were signed into law by Governor Kemp on December 30, 2021—in other words, districts that meet the first *Gingles* precondition (“*Gingles* 1”).<sup>2</sup>

6. For purposes of the *Gingles* 1 analysis in this declaration, and unless otherwise noted, I define majority-Black districts as those that are majority-Black voting age (“BVAP”). I also report whether districts are majority-Black citizen voting age (“BCVAP”).<sup>3</sup>

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<sup>1</sup> In this declaration, “African-American” refers to persons who are single-race Black or Any Part Black (i.e. persons of two or more races and some part Black), including Hispanic Black. In some instances (e.g. for historical comparisons) numerical or percentage references identify single-race Black as “SR Black” and Any Part Black as “AP Black.” Unless noted otherwise, “Black” means AP Black. It is my understanding that following the U.S. Supreme Court decision in *Georgia v. Ashcroft*, 539 U.S. 461 (2003), the “Any Part” definition is an appropriate Census classification to use in most Section 2 cases. Notably, the Census presents the question as a checkbox, giving respondents a yes-or-no, binary choice to identify as Black; using the AP Black metric ensures that anyone who self-identifies in this manner is included.

Throughout this report, I refer to the two legislative plans signed into law by Governor Kemp as the 2021 Senate Plan and the 2021 House Plan, respectively.

<sup>2</sup> See *Thornburg v. Gingles*, 478 U.S. 30, 50 (1986).

<sup>3</sup> The CVAP estimates I report count only persons who are non-Hispanic single-race Black. The estimates are disaggregated from the block group level as published by the U.S. Census Bureau. The most current data available is from the 2015-2019 Special Tabulation, with a survey

7. The two illustrative plans that I have prepared (one for the State House and one for the State Senate) demonstrate that Georgia's Black population is sufficiently numerous and geographically compact to allow for the creation of at least three additional majority-Black Senate districts and five additional majority-Black House districts.

8. The illustrative plans comply with traditional redistricting principles, including population equality, compactness, contiguity, respect for communities of interest, and the non-dilution of minority voting strength.

9. The illustrative plans are drawn to follow, to the extent possible, county and VTD<sup>4</sup> boundaries. Where counties are split to comply with one-person one-vote requirements or to avoid pairing incumbents, I have generally used whole 2020 Census VTDs as sub-county components. Where VTDs are split, I have followed census block boundaries that are aligned with roads, natural features, census block groups, or municipal boundaries.

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midpoint of July, 1 2017.

<https://www.census.gov/programs-surveys/decennial-census/about/voting-rights/cvap.html>

The 2016-2020 ACS Special Tabulation has been delayed due to the pandemic. The 2016-2020 estimates will reflect Census 2020 population distribution, which could require updates to the number of majority-BCVAP districts.

<sup>4</sup> "VTD" is a Census Bureau term meaning "voting tabulation district." VTDs generally correspond to precincts. Statewide, there are 2,698 2020 VTDs.

10. **Exhibit B** describes the sources and methodology I have employed in the preparation of this report and the illustrative plans. Briefly, I used the Maptitude software program as well as data and shapefiles from the U.S. Census Bureau and the Georgia Legislative and Congressional Reapportionment Office, among other sources.

### **B. Summary of Expert Conclusions**

11. Based on my *Gingles* 1 analysis, I conclude the following:

#### **State Senate**

- The 2021 Senate Plan contains 14 majority-Black districts (15 that are both BVAP and BCVAP).
- As shown in the Plaintiffs' Illustrative Senate Plan, a statewide Senate plan can be drawn with 19 majority-Black districts, including two additional majority-Black districts in south Metro Atlanta and an additional majority-Black district anchored in the eastern portion of Georgia's Black Belt (encompassing part of Augusta and extending west to Baldwin and Houston Counties).<sup>5</sup>

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<sup>5</sup> In addition, the Illustrative Senate Plan described *infra* also creates an additional majority-Black Senate district in Gwinnett and Dekalb Counties (District 9), and an additional majority-Black Senate district in Cobb County (District 6), for a total of 19 statewide.

- The Black population in south Metro Atlanta is sufficiently numerous and geographically compact to allow for the creation of at least two additional compact majority-Black Senate districts.
- The Black population in and around Georgia's eastern Black Belt counties (an area I define in greater detail below) is sufficiently numerous and geographically compact to form an additional compact majority-Black Senate district.

### **State House**

- The 2021 House Plan contains 49 majority-Black districts (47 of which are also majority BCVAP).
- As shown in the Plaintiffs' Illustrative House Plan, a statewide House Plan can be drawn with at least 54 majority-Black districts (53 that are both BVAP and BCVAP), including four additional majority-Black districts anchored in south Metro Atlanta and two additional majority-Black districts in Georgia's Black Belt.
- The Black population in south Metro Atlanta is sufficiently numerous and geographically compact to allow for the creation of at least three additional compact majority-Black House districts in Metro Atlanta.

- The Black population in and around the eastern Black Belt counties is sufficiently numerous and geographically compact to form an additional compact majority-Black House district.
- The Black population in and around the western Black Belt counties is sufficiently numerous and geographically compact to form an additional compact majority-Black House district.

### **C. Gingles 1 Analysis – Focus Areas**

12. According to the data collected in the 2020 Census, and as discussed in further detail below, Georgia's Black population has grown significantly since 2010. The State's Black population is up by 484,848 persons, the equivalent of 2.5 State Senate districts or eight entire State House districts. By contrast, the State's white population actually declined during that same period. Yet despite the significant growth in Georgia's Black population since 2010, almost no additional majority-Black districts are created in Georgia's 2021 Senate and House Plans.<sup>6</sup>

13. The 2021 Senate Plan merely maintains the status quo, with 14 majority-Black districts, the same number as in the previous plan which was enacted in 2012

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<sup>6</sup> The ideal population size for a Senate district is 191,284 and 59,511 for a House district. Those numbers are derived from the State's total population and the number of seats in each body.

and first used in 2014 during mid-decade redistricting (the “2014 Benchmark Senate Plan”).<sup>7</sup>

14. The 2021 House Plan has two more majority-Black districts than the previous plan, which was enacted in 2015 (the “2015 Benchmark House Plan”) (and which in turn incorporated a discrete set of changes to the plan enacted in 2012).<sup>8</sup> That small increase is nowhere near commensurate with the significant growth of Georgia’s Black population during that period.

15. Under the 2021 Senate Plan, 10 of the 14 majority-Black districts are in Metro Atlanta. Under the 2021 House Plan, 33 of the 49 majority-Black districts are in Metro Atlanta.<sup>9</sup>

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<sup>7</sup> I am counting Senate District 41 as majority-Black under the 2014 Benchmark Senate Plan. That district, which was 51.4% BVAP when drawn under the 2010 Census, slipped to 49.76% BVAP according to the 2020 Census (though it remained a BCVAP-majority district at 57.22% BCVAP).

Notably, Senate District 2 in the 2014 Benchmark Senate Plan was similarly drawn at 50.94% BVAP based on 2010 Census data, but had fallen to 47.09% BVAP under the 2020 Census (though it remained at 53.43% BCVAP). Under the 2021 Senate Plan and the Illustrative Senate Plan, District 2 is no longer majority-BVAP (46.86% in both plans) but remains majority-BCVAP (53.13% in both plans). I am not counting Senate District 2 as majority-Black under the 2014 Benchmark Senate Plan, though I note that doing so would result in the 2021 Senate Plan having one *fewer* majority-Black Senate district than its predecessor plan.

<sup>8</sup> The Senate and House plans initially enacted after the 2010 Census are included in Exhibits I-2 and V-2, *infra*. These historical plans are not substantially different than the Benchmark plans with respect to the number of majority-Black districts. The prior Senate and House maps, enacted in 2006, are also included in Exhibits I-3 and V-3, respectively.

<sup>9</sup> In this declaration, Metro Atlanta refers to the 29-county Atlanta Metropolitan Statistical Area (“MSA”) defined by the U.S. Office of Management and Budget. It includes the Counties of Barrow, Bartow, Butts, Carroll, Cherokee, Clayton, Cobb, Coweta, Dawson, DeKalb, Douglas,

16. To determine where additional majority-Black districts could be drawn, I initially focused on areas with substantial Black populations, in particular:

- (1) Metro Atlanta counties (as defined by the Atlanta-Sandy Springs-Alpharetta MSA boundaries) shown in the Census Bureau’s map in **Exhibit C**;
- (2) Georgia’s Black Belt (as defined by the Georgia Budget and Policy Institute (“GBPI”) shown in the map in **Figure 1**.<sup>10</sup> **Exhibit D** is an excerpt from the GBPI report (Appendix A) identifying the Black Belt counties and school districts depicted in Figure 1. More broadly, and as the GBPI report explains, the term “Black Belt” refers to a swath of the American South that historically had large numbers of enslaved Black persons, and that today continues to have substantial Black populations; in Georgia, the area comprising the Black Belt

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Fayette, Forsyth, Fulton, Gwinnett, Haralson, Heard, Henry, Jasper, Lamar, Meriwether, Morgan, Newton, Paulding, Pickens, Pike, Rockdale, Spalding, and Walton.

MSA is an abbreviation for “metropolitan statistical area.” Metropolitan statistical areas are defined by the U.S. Office of Management and Budget and reported in historical and current census data produced by the Census Bureau. MSAs “consist of the county or counties (or equivalent entities) associated with at least one urbanized area of at least 50,000 population, plus adjacent counties having a high degree of social and economic integration with the core as measured through commuting ties.”

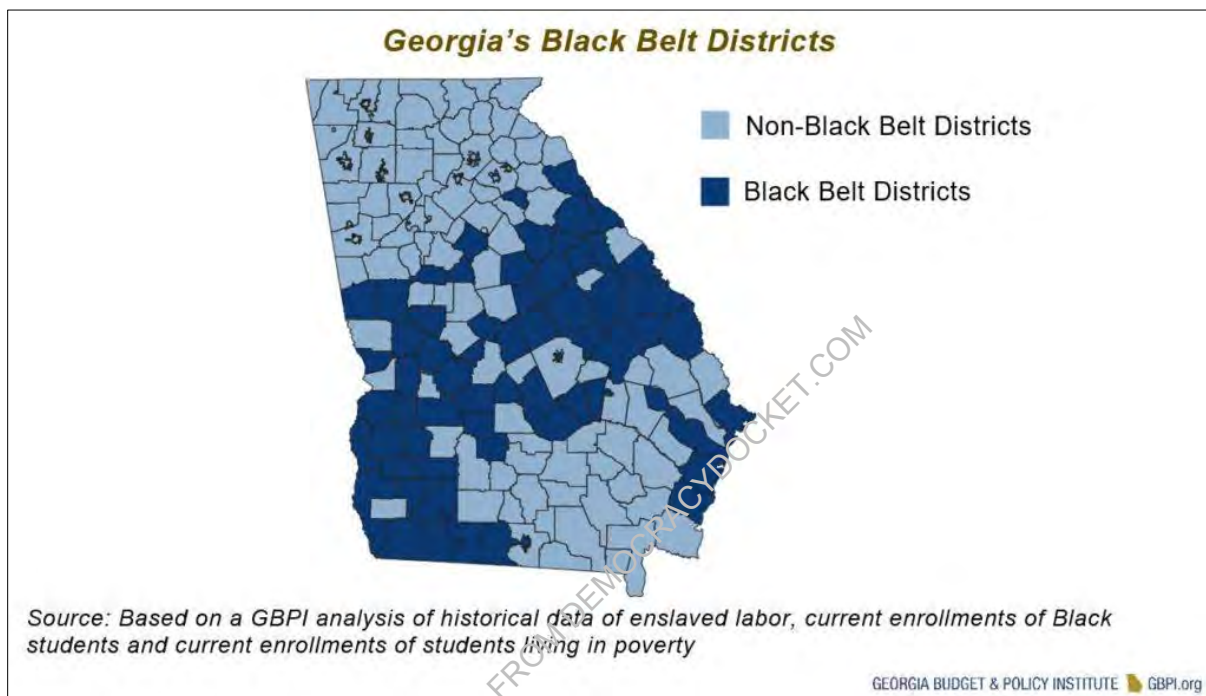
<https://www.census.gov/programs-surveys/metro-micro/about.html>

<sup>10</sup> For a current and historical analysis of Georgia’s Black Belt, see *Education in Georgia’s Black Belt: Policy Solutions to Help Overcome a History of Exclusion* (Stephen Owens, October 10, 2019), published by the Georgia Budget & Policy Institute. <https://gbpi.org/education-in-georgias-black-belt>.

extends roughly southwest from the area around Augusta to the southwest corner of the State.

**Figure 1**

**Georgia's Black Belt School Districts**



17. Upon review, I narrowed my focus to three regions within those larger areas (see maps in **Exhibit E** and **Figure 4** *infra*):

18. **(Region A) South Metro Atlanta:** suburban /exurban counties in a significantly Black, racially diverse, and geographically compact region that has emerged over the past quarter of a century—specifically, the counties of Fayette, Spalding, Henry, Rockdale, and Newton.

19. The Georgia Governor's Office of Planning and Budget projects that this 5-county region will have 725,000 residents by the time of the 2030 Census –



up by about 92,000 persons over the Census 2020 enumeration, of whom 61% will be non-White. African Americans are projected to account for about 60% of the non-White population increase.<sup>11</sup>

20. Under the 2021 Senate Plan, parts of three majority-Black districts are in the south Metro counties—Senate Districts 10, 34, and 43.

21. Under the 2021 House Plan, parts of seven majority-Black House districts are in these five south Metro counties.

22. **(Region B) Eastern Black Belt Area:** urban Black Belt Richmond County (Augusta) plus a group of rural Black Belt counties in a geographically compact area. The rural counties are home to a long-standing Black community that has not been in a majority-Black Senate district since the passage of the 1965 Voting Rights Act.

23. All of the Region B counties are part of the Central Savannah River Area, as shown in **Exhibit F** on the regional commission map prepared by the Georgia Department of Community Affairs (“GDCA”).

24. As shown on the GDCA map, Region B encompasses the following Central Savannah River Area counties: (counter clockwise from east to west) Jenkins, Burke, Richmond, Jefferson, McDuffie, Wilkes, Taliaferro, Glascock,

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<sup>11</sup> <https://opb.georgia.gov/census-data/population-projections>.

Warren, Washington, and Hancock. Ten of these 11 contiguous counties—excluding Glascock (pop. 2,884)—are identified as part of Georgia’s Black Belt by GBPI. Moreover, additional adjacent counties, such as Baldwin County, lie outside the Central Savannah River Area Regional Commission area but are also identified as part of the Black Belt by GBPI and have substantial Black populations.

25. The 2021 Senate Plan includes one majority-Black district in Region B—Senate District 22 (56.5% BVAP)—in Augusta/Richmond County, and a small part of another majority Black district—Senate District 26 (56.99% BVAP)—anchored in Macon/Bibb County.

26. The 2021 House Plan contains five majority-Black districts in the Region B area.

27. **(Region C) Western Black Belt Area:** urban Black Belt Dougherty County (Albany) plus a group of southwest Georgia rural Black Belt counties in a geographically compact area, implicitly identified in the area encompassed by majority-Black Senate District 12 (57.97% BVAP) in the 2021 Senate Plan.

28. Region C encompasses part of the Southwest Georgia and Valley River Area regional commission areas depicted on the GDCA map in **Exhibit F**.

29. The 2021 House Plan contains just two majority-Black House districts in Region C, even though there is obviously sufficient Black population to create

three districts in an area generally circumscribed by Senate District 12 in the 2021 Senate Plan.

30. Senate District 12 encompasses 13 counties: (counter clockwise from north to south on the GDCA map) Sumter, Webster, Stewart, Quitman, Randolph, Terrell, Clay, Calhoun, Dougherty, Early, Miller, Baker, and Mitchell. Twelve of the 13 counties—excluding Miller (pop. 6,000)—are identified by GBPI as Black Belt counties.<sup>12</sup> Moreover, additional adjacent counties, such as Thomas County, lie outside of Senate District 12 in 2021 Senate Plan but are also identified as part of the Black Belt by GBPI and have substantial Black populations.

#### **D. Organization of Declaration**

31. The remainder of this declaration is organized as follows: **Section II** reviews state and regional demographics since 1990. **Section III** reviews the benchmark 2014 Senate Plan and the 2021 Senate Plan. **Section IV** presents the Illustrative Senate Plan that I have prepared, containing 19 majority-Black districts. **Section V** reviews the benchmark 2015 House Plan and the enacted 2021 House Plan. **Section VI** presents the Illustrative House Plan that I have prepared, containing 54 majority-Black districts.

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<sup>12</sup> Plaintiffs' Illustrative Senate Plan also contains a majority-Black Senate District in the same general area of southwest Georgia, Illustrative Senate District 12 (57.34% BVAP).

## II. DEMOGRAPHIC PROFILE – STATEWIDE AND REGIONAL

32. This section provides current and historical population summaries for Georgia, Metro Atlanta, and for the three distinct areas where additional majority-Black House districts can be created—generally defined by **(Region A)** the 5-county south Metro Atlanta area, **(Region B)** the 11-county in the eastern Black Belt within the Augusta/Central Savannah River Regional Commission area, and **(Region C)** the 13-county western Black Belt around Albany and Southwest Georgia.

### A. 2010 to 2020: A Decade of Minority Population Growth in Georgia

33. According to the 2020 Census, Georgia has a total population of 10,711,908—up by 1.02 million since 2010. Georgia’s population growth since 2010 can be attributed entirely to gains in the overall minority population.

34. Between 2010 and 2020, nearly half (47.26%) of the State’s population gain is attributed to Black population growth.

35. **Figure 2** reveals that Georgia’s Black population, as a share of the overall statewide population, increased between 2010 and 2020 from **31.53%** Black in 2010 to **33.03%** in 2020. Over the 2010 to 2020 decade, the Black population in Georgia increased by 484,048 persons—an increase of nearly 16% from the 2010 baseline. By contrast, between 2010 and 2020, the non-Hispanic White (“NH White”) population fell by -51,764 persons.

**Figure 2**

**Georgia – 2010 Census to 2020 Census  
Population by Race and Ethnicity**

	2010 Number	Percent	2020 Number	Percent	2010 - 2020 Change	% 2010 - 2020 Change
Total Population	9,687,653	100.0%	10,711,908	100.00%	1,024,255	10.57%
NH White*	5,413,920	55.88%	5,362,156	50.06%	-51,764	-0.96%
Total Minority Pop.	4,273,733	44.12%	5,349,752	49.94%	1,076,019	25.18%
Latino	853,689	8.81%	1,123,457	10.49%	269,768	31.60%
NH Black*	2,910,800	30.05%	3,278,119	30.60%	367,319	12.62%
NH Asian*	311,692	3.22%	475,680	4.44%	163,988	52.61%
NH Hawaiian and PI*	5,152	0.05%	6,101	0.06%	949	18.42%
NH American Indian and Alaska Native*	21,279	0.22%	20,375	0.19%	-904	-4.25%
NH Other*	19,141	0.20%	55,887	0.52%	36,746	191.98%
NH Two or More Races	151,980	1.57%	390,133	3.65%	238,153	156.70%
SR Black (Single-race Black)	2,950,435	30.46%	3,320,513	31.00%	370,078	12.54%
AP Black (Any Part Black)	3,054,098	31.53%	3,538,146	33.03%	484,048	15.85%
NH Any Part Black	2,997,627	30.94%	3,455,484	32.26%	457,857	10.57%

\* Single-race, non-Hispanic.

36. Non-Hispanic Whites are a razor-thin majority of the 2020 population (50.06%). Black Georgians account for one-third (33.03%) of the population and comprise the largest minority population, followed by Latinos (10.05%).

**B. Voting Age and Citizen Voting Age Populations in Georgia**

37. As shown in **Figure 3**, African Americans in Georgia constitute a slightly smaller percentage of the voting age population (VAP) than the total population. According to the 2020 Census, Georgia has a total VAP of 8,220,274 – of whom 2,607,986 (31.73%) are AP Black. The NH White VAP is 4,342,333 (52.82%).

**Figure 3****Georgia – 2020 Voting Age Population & 2019 Estimated Citizen Voting Age Population by Race and Ethnicity<sup>13</sup>**

	<b>2020 VAP</b>	<b>2020 VAP Percent</b>	<b>2019 CVAP Percent</b>
<b>Total</b>	8,220,274	100.00%	100.00%
NH White 18+	4,342,333	52.82%	57.6%
Total Minority 18+	3,877,941	47.18%	42.4%
Latino 18+	742,918	9.04%	5.0%
Single-race Black (Including Black Hispanics) 18+	2,488,419	30.27%	32.9%
<b>Any Part Black (Including Black Hispanics) 18+</b>	2,607,986	31.73%	33.8%

38. The rightmost column in **Figure 3** reveals that both the Black and NH White population comprise a higher percentage of CVAP than the corresponding VAP, owing to higher non-citizenship rates among other minority populations.

39. According to estimates from the 1-year 2019 *American Community Survey* (“ACS”), African Americans represent 33.8% of the statewide CVAP—

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<sup>13</sup> Sources:

**PL94-171 Redistricting File** (Census 2020);

**Table S2901 – CITIZEN, VOTING-AGE POPULATION BY SELECTED CHARACTERISTICS** (1-year 2019 ACS)

<https://data.census.gov/cedsci/table?q=S2901&g=0400000US13&tid=ACSS1Y2019.S2901>.

**2019 ACS 1-Year Estimates 1-Year Estimates-Public Use Microdata Sample**

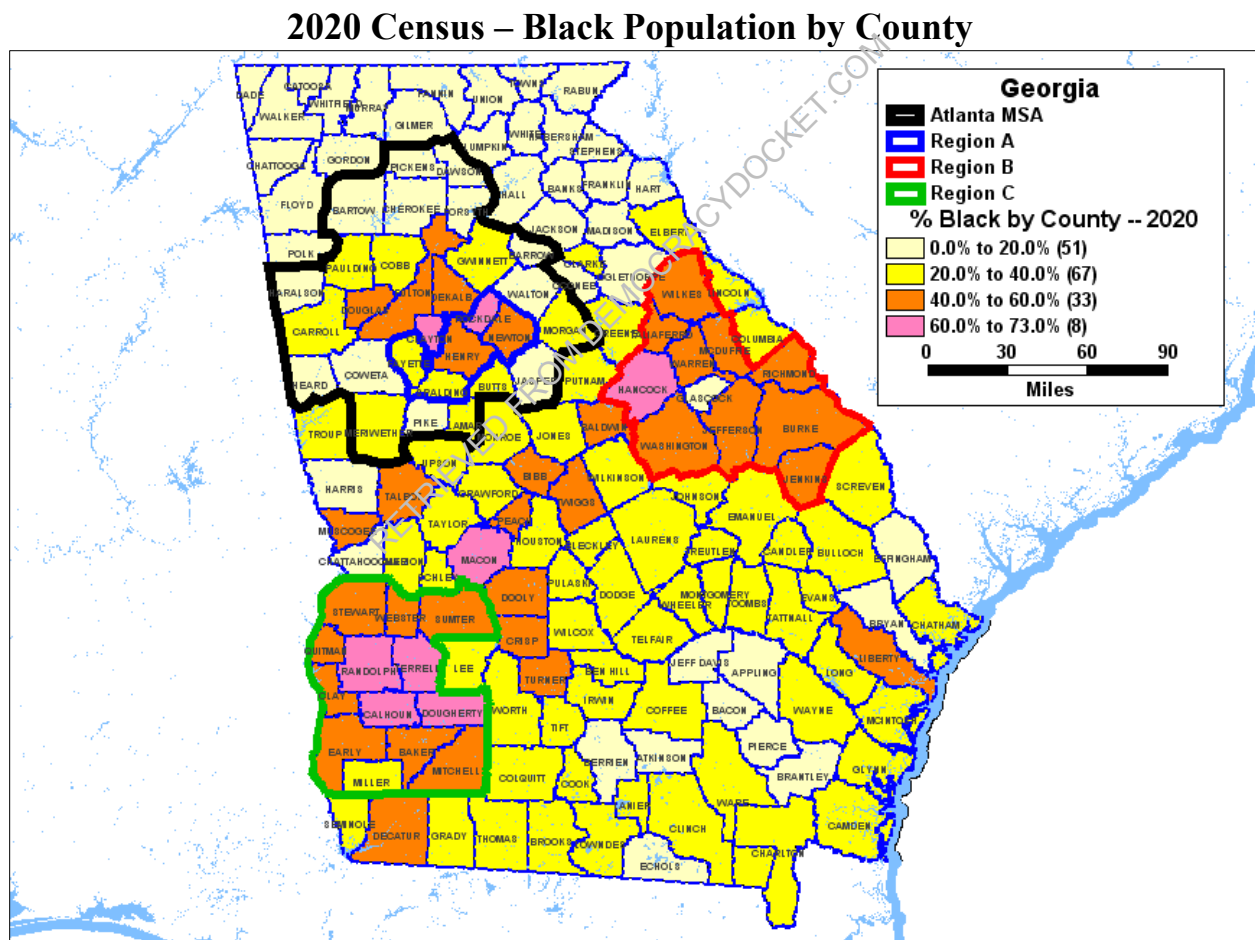
[https://data.census.gov/mdat/#/search?ds=ACSPUMS1Y2019&vv=AGEP\(18:99\)&cv=RACBLK\(1\)&rv=ucgid,CIT\(1,2,3,4\)&wt=PWGTP&g=0400000US13](https://data.census.gov/mdat/#/search?ds=ACSPUMS1Y2019&vv=AGEP(18:99)&cv=RACBLK(1)&rv=ucgid,CIT(1,2,3,4)&wt=PWGTP&g=0400000US13).

about 2 percentage points higher than the 2020 AP Black VAP. The NH White CVAP is 57.6%, nearly 5 points higher than NH White VAP in the 2020 Census.<sup>14</sup>

### **C. 2020 Census Spatial Distribution of Georgia's Black Population**

40. The map in **Figure 4** depicts the 2020 Black population percentage for Georgia's 159 counties. 67 are in the 20% to 40% range, 33 are 40% to 60%, and 8 are between 60% and 73%. The bold black boundary identifies the Atlanta MSA.

**Figure 4**



<sup>14</sup> Due to the COVID-19 pandemic, the 1-year 2020 ACS results will not be published.

Source:

<https://www.census.gov/newsroom/press-releases/2021/changes-2020-acs-1-year.html>.

41. Color lines on the **Figure 4** map demarcate the areas I focused on to determine prospects for additional majority-Black House districts: **Region A** (blue outline), which is south Metro Atlanta; **Region B** (red outline), a group of Black Belt counties around Augusta (Richmond County); and **Region C** (green outline), a group of Black Belt counties around Albany (Dougherty County). A high-resolution version of the **Figure 4** map is in **Exhibit E**.

42. **Exhibit G-1** is a table showing 2010 and 2020 county populations by race and ethnicity, with population change between 2010 and 2020. **Exhibit G-2** is a table showing the percentage Black population changes by county between 2010 and 2020. **Exhibit G-3** is a table showing 2000 and 2010 county populations by race and ethnicity, with population change between 2000 and 2010. **Exhibit G-4** is a table showing 1990 and 2000 county populations by race and ethnicity, with population change between 1990 and 2000.

#### **D. Black Population as a Component of Total Population from 1990 to 2020**

##### **(1) Georgia – Statewide**

43. As shown in **Figure 5**, Georgia's Black population has increased significantly in absolute and percentage terms since 1990, from about 27% in 1990 to 33% in 2020. Over the same time period, the percentage of the population identifying as NH White has dropped from 70% to 50%.



**Figure 5**

**Georgia – 1990 Census to 2020 Census  
Population by Race and Ethnicity**

	1990 Number	Percent	2000 Number	Percent	2010 Number	Percent	2020 Number	Percent
Total Population	6,478,216	100.00%	8,186,453	100.00%	9,687,653	100.0%	10,711,908	100.00%
NH White	4,543,425	70.13%	5,128,661	62.65%	5,413,920	55.88%	5,362,156	50.06%
<b>Total Minority Pop.</b>	1,934,791	29.87%	3,057,792	37.35%	4,273,733	44.12%	5,349,752	49.94%
Latino	108,922	1.68%	435,227	5.32%	853,689	8.81%	1,123,457	<b>10.49%</b>
<b>Black*</b>	1,746,565	26.96%	2,393,425	<b>29.24%</b>	3,054,098	<b>31.53%</b>	3,538,146	<b>33.03%</b>

\* SR Black in 1990 – AP Black 2000-2020.

**(2) Metro Atlanta – 29-County MSA**

44. **Figure 6** summarizes the obvious. The key driver of population growth in Georgia this century has been Metro Atlanta, led in no small measure by a large increase in the Black population in the area. (See **Exhibit C** depicting the 29-county MSA area with bold green lines).

**Figure 6**

**29-County MSA – Metro Atlanta – 1990 to 2020  
Population by Race and Ethnicity**

	1990 Number	Percent	2000 Number	Percent	2010 Number	Percent	2020 Number	Percent
Total Population	3,082,308	100.00%	4,263,438	100.00%	5,286,728	100.00	6,089,815	100.00%
NH White	2,190,859	71.08%	2,576,109	60.42%	2,684,571	50.78%	2,661,835	43.71%
<b>Total Minority Pop.</b>	891,449	28.92%	1,687,329	39.58%	2,602,157	49.22%	3,427,980	56.29%
Latino	58,917	1.91%	270,655	6.35%	547,894	10.36%	730,470	11.99%
<b>Black*</b>	779,134	25.28%	1,248,809	29.29%	1,776,888	33.61%	2,186,815	35.91%

\* SR Black in 1990, AP Black 2000-2020.

45. Under the 1990 Census, today's 29 county-MSA was 25.28% Black, increasing to 35.91% in 2020. Since 2000, the Black population in Metro Atlanta has climbed by 75%, from 1,248,809 to 2,186,815 in 2020.

46. According to the 2020 Census, 56.29% of Metro Atlanta residents are non-White—a major shift compared to the previous decade. In 2010, NH Whites represented 50.78% of the population.

47. According to the 2020 Census, the 11 core counties comprising the Atlanta Regional Commission (“ARC”) service area<sup>15</sup> account for more than half (54.7%) of the statewide Black population. After expanding the Metro Atlanta area to include the 29 counties in the Atlanta MSA (including the 11 ARC counties), Metro Atlanta encompasses 61.81% of the state's Black population.

### **(3) Region A – 5-County South Metro Atlanta**

48. The table in **Figure 7** presents similar 1990 to 2020 population details for the five south Metro Atlanta counties (**Region A**), where I have determined that two additional majority-Black Senate districts and at least three additional majority-Black House districts can be drawn.

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<sup>15</sup> <https://atlantaregional.org/atlanta-region/about-the-atlanta-region>.

**Figure 7**

**Region A – 5-County South Metro Atlanta – 1990 to 2020  
Population by Race and Ethnicity**

	<b>1990 Number</b>	<b>Percent</b>	<b>2000 Number</b>	<b>Percent</b>	<b>2010 Number</b>	<b>Percent</b>	<b>2020 Number</b>	<b>Percent</b>
Total Population	271,512	100.00%	401,133	100.00%	559,735	100.00%	633,265	100.00%
NH White	227,297	83.72%	305,779	76.23%	305,092	54.51%	262,792	41.50%
<b>Total Minority Pop.</b>	44,215	16.28%	95,354	23.77%	254,643	45.49%	370,473	58.50%
Latino	2,757	1.02%	11,560	2.88%	33,722	6.02%	48,287	7.63%
<b>Black*</b>	38,945	14.34%	74,249	18.51%	205,426	36.70%	294,914	46.57%

\* SR Black in 1990, AP Black 2000-2020.

49. As is readily apparent from the **Figure 7** timeline, south Metro Atlanta has undergone a dramatic demographic transformation over the past 30 years. In 1990, just 14.34% of the population in the 5-county south Metro Atlanta area was Black. By 2010, the Black population had more than doubled to reach 36.70% of the overall population, then climbing to 46.57% in 2020.

50. Between 2000 and 2020, the Black population in the 5-county south Metro Atlanta region quadrupled, from 74,249 to 294,914. The NH White population in the region actually decreased during the same period.

**(4) Region B – Eastern Black Belt**

51. In contrast to south Metro Atlanta, the Black Belt counties in the Augusta area have experienced a slight overall population decline since 1990, from 331,615 to 325,164 in 2020. However, the Black population in the region has

grown. **Figure 8** reveals that a 19% increase in the Black population since 1990 has been offset by a 28.7% decline in the NH White population.

**Figure 8**

**Region B – Eastern Black Belt Area - 1990 to 2020  
Population by Race and Ethnicity**

	<b>1990 Number</b>	<b>Percent</b>	<b>2000 Number</b>	<b>Percent</b>	<b>2010 Number</b>	<b>Percent</b>	<b>2020 Number</b>	<b>Percent</b>
Total Population	331,615	100.00%	321,998	100.00%	322,852	100.00%	325,164	100.00%
NH White	174,163	52.52%	146,870	45.61%	133,467	41.34%	124,115	38.17%
<b>Total Minority Pop.</b>	157,452	47.48%	175,128	54.39%	189,385	58.66%	201,049	61.83%
Latino	4,412	1.33%	7,173	2.23%	11,179	3.46%	14,751	4.54%
<b>Black*</b>	149,307	45.02%	163,130	50.66%	173,238	53.66%	177,610	54.62%

\* SR Black in 1990 – AP Black 2000-2020.

52. In 1990, the Black population in Region B represented 45.02% of the total population, climbing to 54.62% in 2020.

53. The 2020 population in the 14-county area that I identified as Region B is sufficient to form only about 1.7 Senate districts or 5.5 House districts, which is below what would be necessary to create a second majority-Black Senate district or a sixth majority-Black House district. However, as shown in the Illustrative Senate and House Plans discussed in this report, this population deficit can be overcome, and additional majority-Black Senate and House districts can be drawn, by including contiguous, demographically similar Black Belt counties such as Baldwin, Putnam, and Wilkinson in the additional districts.

### (5) Region C – Western Black Belt

54. As shown in **Figure 9**, the western Black Belt has experienced a population decline since 2010, after holding relatively stable between 1990 and 2010. All of the population loss can be attributed to a steady decline in the NH White population over the past several decades

**Figure 9**

#### **Region C – Western Black Belt Area - 1990 to 2020 Population by Race and Ethnicity**

	<b>1990 Number</b>	<b>Percent</b>	<b>2000 Number</b>	<b>Percent</b>	<b>2010 Number</b>	<b>Percent</b>	<b>2020 Number</b>	<b>Percent</b>
Total Population	205,742	100.00%	214,686	100.00%	209,747	100.00	190,819	100.00%
NH White	100,751	48.97%	90,946	42.36%	76,748	36.59%	64,553	33.83%
<b>Total Minority Pop.</b>	104,991	51.03%	123,740	57.64%	132,999	63.41%	126,266	66.17%
Latino	1,485	0.72%	3,588	1.67%	7,377	3.52%	7,429	3.89%
<b>Black*</b>	102,728	49.93%	118,786	55.33%	123,663	58.96%	115,621	60.59%

\* SR Black in 1990, AP Black 2000.

55. In 1990, NH Whites constituted about half of the overall population. By 2020, NH Whites comprised only about one-third. Over the same time period, the Black population grew in absolute terms from 102,728 to 115,621, representing just under half the population in 1990, but 60.6% of the population by 2020.

56. There is insufficient population to create an additional majority-Black Senate district in Region C and the counties immediately adjacent to Region C in the western Black Belt. However, as shown in the illustrative plans discussed in this report, an additional House district can be drawn in the area.

### **E. County and Municipal Socioeconomic Characteristics**

57. For background on socioeconomic characteristics by race and ethnicity at the county and community level in Georgia, I have prepared charts based on the 5-year 2015-2019 American Community Survey. That data is compiled online<sup>16</sup> and has been included in a compact-disk as **Exhibit CD**.

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<sup>16</sup> The county level data is available at [http://www.fairdata2000.com/ACS\\_2015\\_19/Georgia/](http://www.fairdata2000.com/ACS_2015_19/Georgia/) and the community-level data is available at [http://www.fairdata2000.com/ACS\\_2015\\_19/Georgia/00\\_Places\\_2500+/.](http://www.fairdata2000.com/ACS_2015_19/Georgia/00_Places_2500+/)

### III. SENATE – HISTORICAL BENCHMARK PLANS AND 2021 PLAN

#### A. Majority-Black Senate Districts – 1990s Plan to 2021 Plan

58. As shown in **Figure 10**, despite the significant growth in Georgia’s Black population since 2000—climbing by 1.2 million persons—the number of majority-Black Senate districts has only inched up to 14 from 13 in the 2006 Plan, and has remained static for the last decade.

**Figure 10**

**Number of Majority-Black Senate Districts by Plan – 2000 to 2021**

Senate Plans <sup>17</sup>	Statewide Majority-Black Districts	Metro Atlanta Majority-Black Districts
1990s Plan – 2000 Census	12	7
2006 Plan – 2010 Census	13	10
2014 Plan – 2020 Census	14	10
2021 Plan – 2020 Census	14	10

59. As **Figure 11** reveals, despite the major changes in the composition of the State’s population, the percentage of Black Georgians of voting age in majority-Black Senate districts has hovered around 50% since the mid-2000s, while the percentage of the NH White VAP in majority-White districts has stayed above 80%

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<sup>17</sup> As discussed *supra* n.8, I am including Senate District 41 as majority-Black under the 2014 Benchmark Senate Plan, even though it had fallen to 49.76% BVAP by the 2020 Census. Notably, when the 2014 Benchmark Senate Plan was drawn, it had 15 total BVAP-majority districts under the 2010 Census, including both Senate District 41 and Senate District 2 in Savannah. In that sense, the 2021 Senate Plan actually represents a *diminution* of one majority-Black district from the last districting effort.

over the same timeframe—indicating that Black populations are disproportionately “cracked” or divided into majority-White districts rather than placed in majority-Black districts.<sup>18</sup>

**Figure 11**

**Same Race VAP in Majority-Black and Majority NH White Districts –  
2000 to 2021**

<b>Senate Plans</b>	<b>Statewide % Black VAP in Majority- Black Districts*</b>	<b>Statewide %NH White VAP in Majority- White Districts</b>
1990s Plan – 2000 Census	43.51%	90.51%
2006 Plan – 2010 Census	53.84%	83.88%
2014 Plan – 2020 Census	52.29%	80.64%
2021 Plan – 2020 Census	52.45%	80.54%

\* Including Senate District 2 for all years and Senate District 41 for 2014 and 2021.

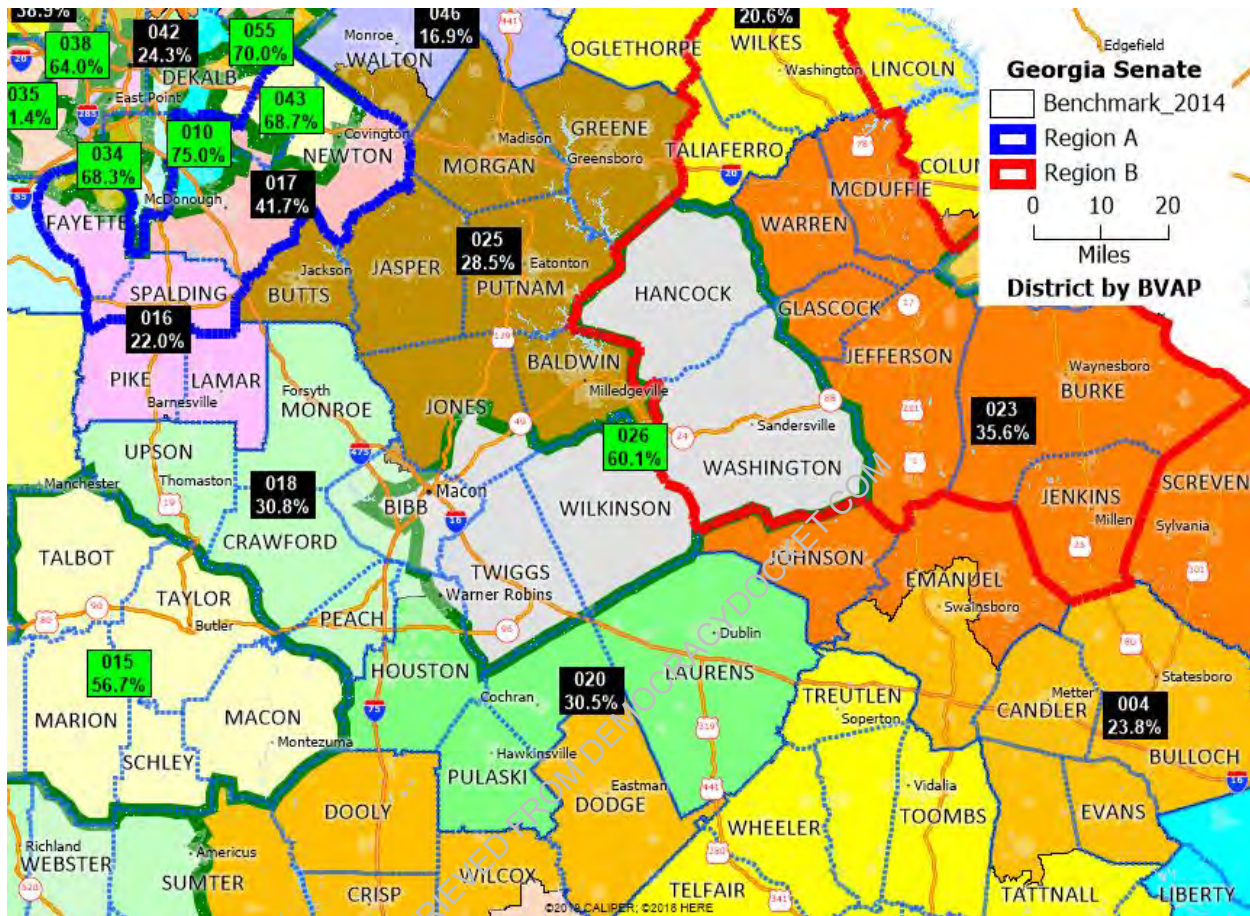
**B. 2014 Benchmark Senate Plan**

60. The map in **Figure 12** displays 2014 Benchmark Senate Plan districts in south Metro Atlanta (Region A) and in the eastern Black Belt (Region B). Labels on the map display the district number and the BVAP percentages, according to the 2020 Census. Green labels and borders identify majority-Black districts. **Exhibit H** is a higher resolution version of the **Figure 12** map.

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<sup>18</sup> “Packing” describes election districts where a minority population is unnecessarily concentrated, resulting in an overall dilution of minority voting strength in the voting plan. “Cracking” describes election plans with one or more districts that fragment or divide the minority population, also resulting in an overall dilution of minority voting strength in the voting plan.



**Figure 12: 2014 Benchmark Senate Plan – Region A and Region B**

61. **Exhibit I-1** contains a map packet depicting the 2014 Benchmark Senate Plan, with corresponding Census 2010 statistics, prepared by the Georgia Legislative & Congressional Reapportionment Office (“GLCRO”). **Exhibit I-2** shows the map for the prior 2011-enacted Senate plan, and **Exhibit I-3** shows the map for the Senate plan enacted in 2006.

62. **Exhibit J-1** is a table reporting Census 2020 population statistics for the 56 districts in the 2014 Benchmark Senate Plan, as well as CVAP estimates from

the 5-year 2015-2019 Special Tabulation.<sup>19</sup> **Exhibits J-2** and **J-3** provide similar population data for the prior, 2011-enacted and 2006-enacted plans.

63. As a result of the dramatic population shifts in Georgia since 2010, the 2014 Benchmark Senate Plan is severely malapportioned, with an overall deviation of 47.75%, according to the 2020 Census.

64. Including Senate District 41 in Metro Atlanta, *see supra* nn.8 & 19, 2014 Benchmark Senate Plan contains 14 majority-Black districts. Fifteen districts in the 2014 Benchmark Plan are BCVAP-majority (the 14 BVAP majority ones plus Senate District 2 in Chatham County). Seventeen are B+L+ACVAP.

65. Additional 2014 Benchmark Senate Plan information regarding compactness scores, county splits, and VTD splits is reported *infra* for comparison with the Illustrative Senate Plan metrics.

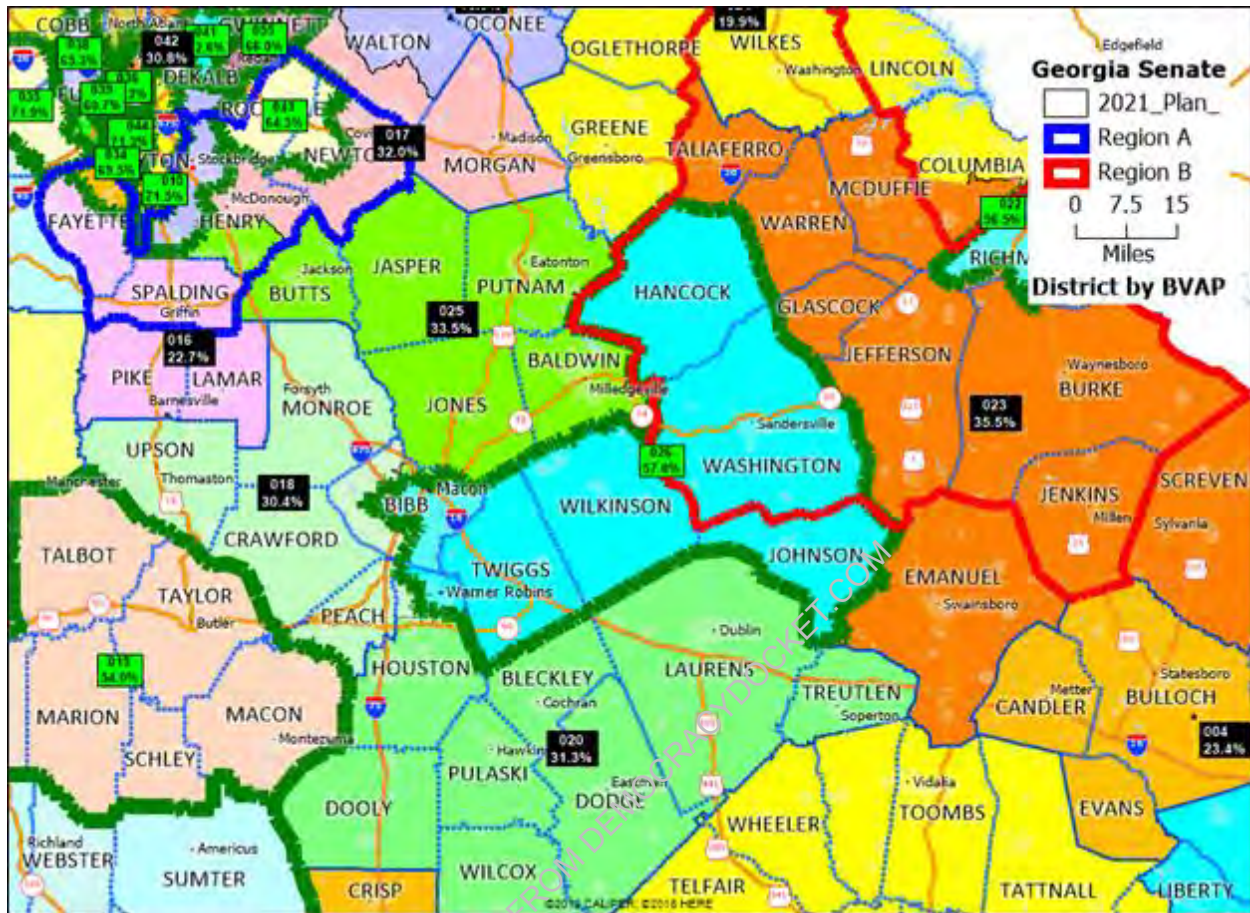
### **C. 2021 Senate Plan**

66. The map in **Figure 13** displays 2021 Senate Plan districts in south Metro Atlanta (Region A) and in the eastern Black Belt (Region B). Green labels and borders identify majority-Black districts. **Exhibit K** is a higher resolution version of the **Figure 13** map.

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<sup>19</sup> <https://www.census.gov/programs-surveys/decennial-census/about/voting-rights/cvap.html>.



**Figure 13: 2021 Senate Plan – Region A and Region B**

67. **Exhibit L** contains a map packet depicting the 2021 Senate Plan, with corresponding Census 2020 statistics, prepared by GLCRO.

68. **Exhibit M** is a table reporting Census 2020 population statistics for the 56 districts in the 2021 Plan, as well as CVAP estimates from the 5-year 2015-2019 Special Tabulation.

69. The 2021 Senate Plan contains 14 majority-Black districts (BVAP). Fifteen are BCVAP majority (the 14 BVAP-majority plus Senate District 2 in

Chatham County). Eighteen districts in the 2021 Senate Plan are majority B+L+ACVAP.

70. Additional 2021 Plan information regarding compactness scores, county splits, VTD splits, and incumbent conflicts is reported for comparison with the Illustrative Senate Plan described in the next section.

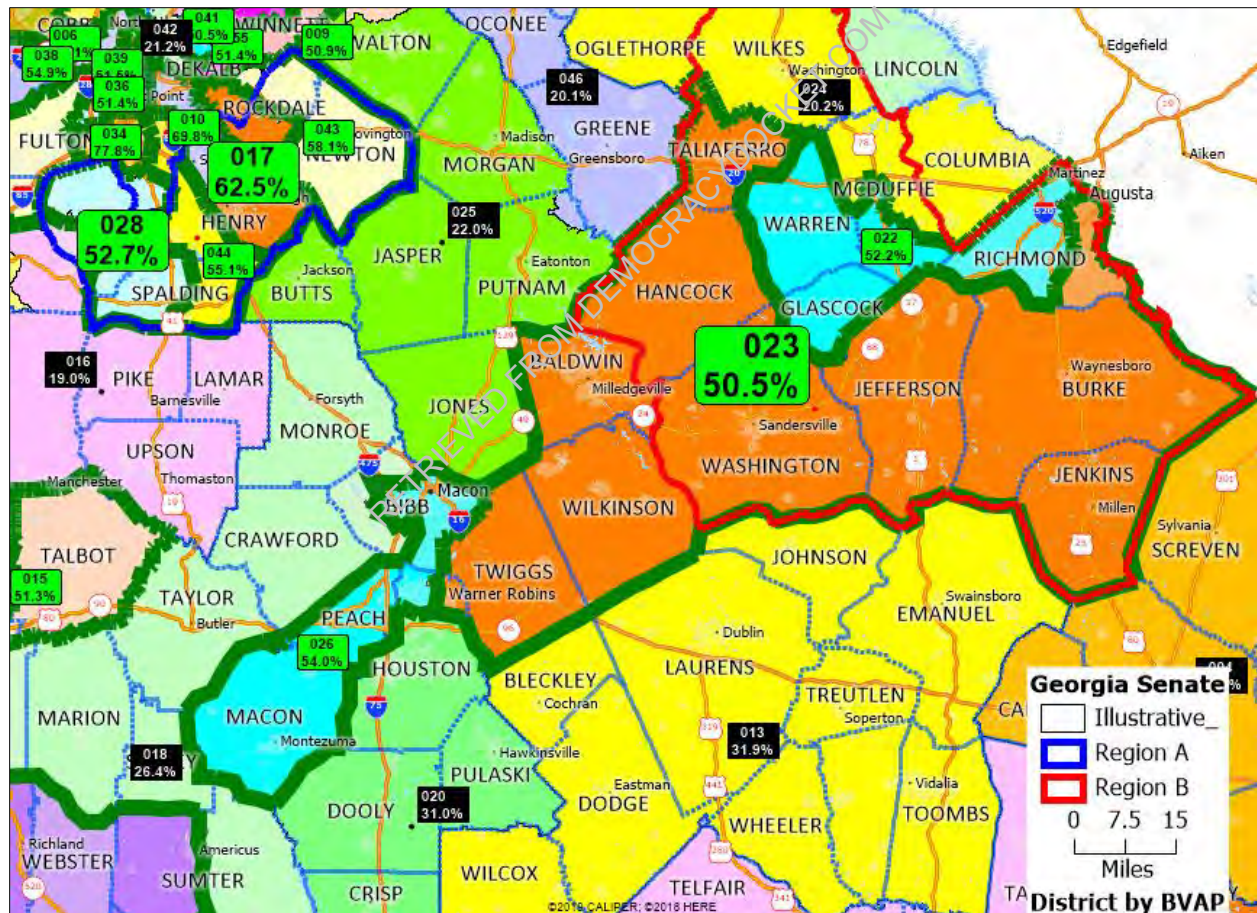
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## IV. ILLUSTRATIVE SENATE PLAN

### A. Statewide

71. The map in **Figure 14** displays Illustrative Senate Plan districts, with the map zoomed to identify the three additional majority Black districts (large green labels and borders) in south Metro Atlanta (Region A) and in the Black Belt (Regions B). **Exhibit N-1** is a higher resolution version of the **Figure 14** map.

**Figure 14**





72. **Exhibit N-2** contains maps for each of the 19 majority-Black districts in the Illustrative Plan.

73. **Exhibit O** is a table reporting Census 2020 population statistics for the 56 districts in the Illustrative Senate Plan, as well as CVAP estimates from the 5-year 2015-2019 Special Tabulation.

74. The Illustrative Senate Plan contains 19 majority-Black districts (BVAP). As with the 2014 Benchmark Senate and 2021 Senate Plans, there is an additional BCVAP-majority district in District 2 in Chatham County. Twenty-one districts in the Illustrative Senate Plan are majority B+L+ACVAP.

**B. Additional Majority Black Districts in the Illustrative Senate Plan**

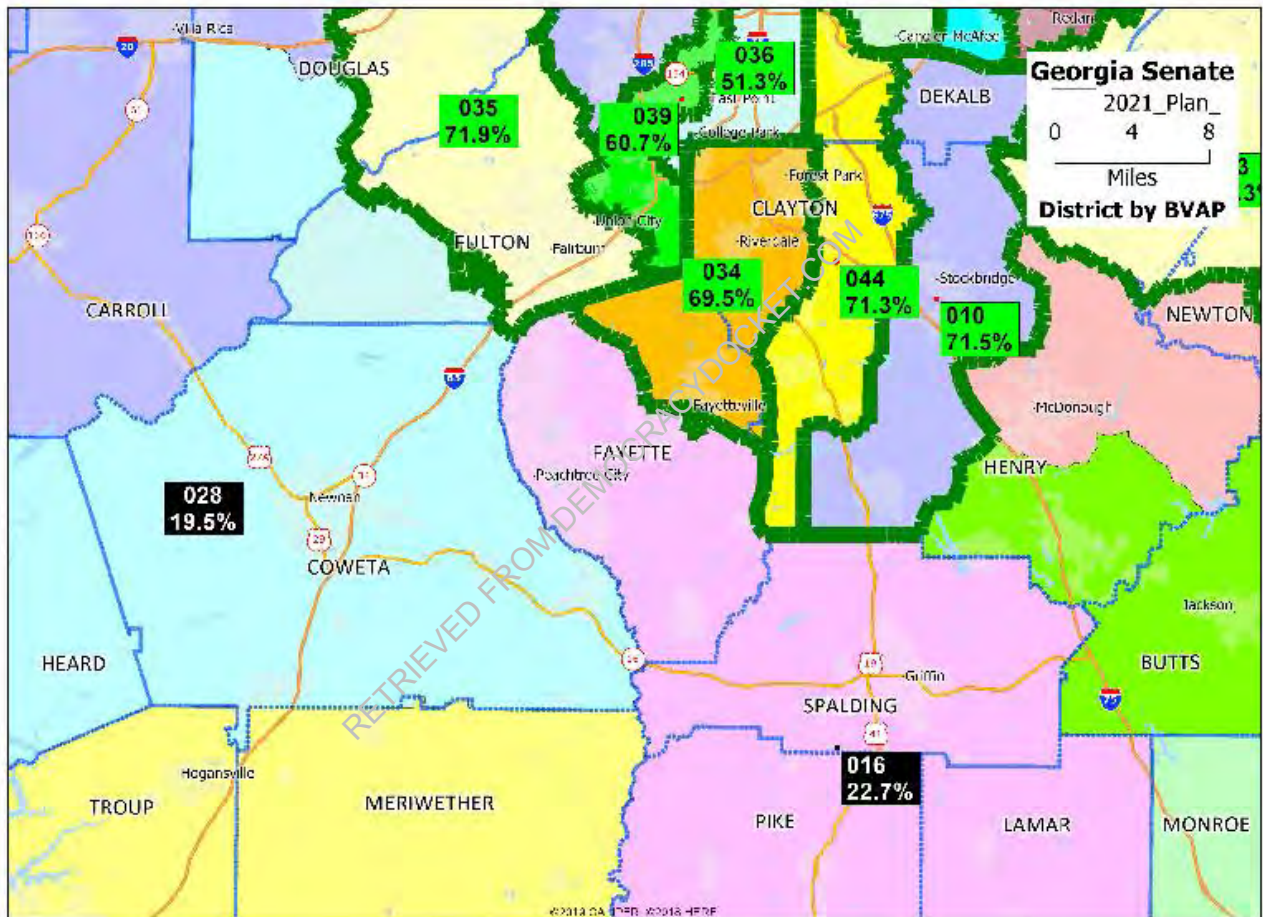
75. The text descriptions of the additional majority-Black Senate districts in the Illustrative Senate Plan set forth below are illustrated with side-by-side comparison map exhibits, depicting the Illustrative Senate Plan and 2021 Senate Plan at the same scale. For ease of reference, these side-by-side pairings are also included in Exhibits as marked below.

76. In these maps, majority-Black districts are outlined with bold green boundaries and labels.



even as the White population there fell. Senate District 16 was nevertheless drawn with a BVAP of under 23% by combining Fayette and Spalding Counties with Whiter and more rural Pike and Lamar Counties.

**Figure 16:** 2021 Plan District 16 and vicinity

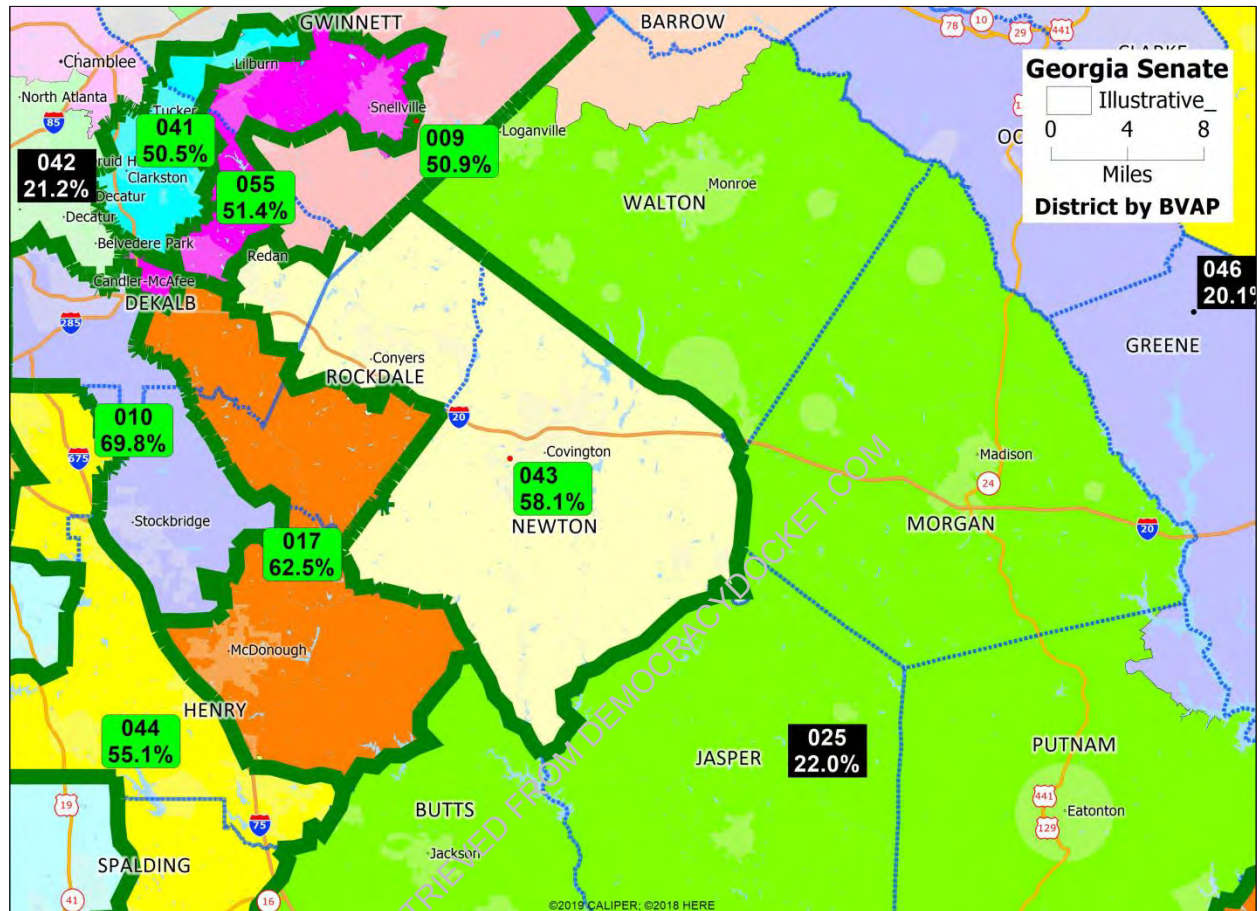




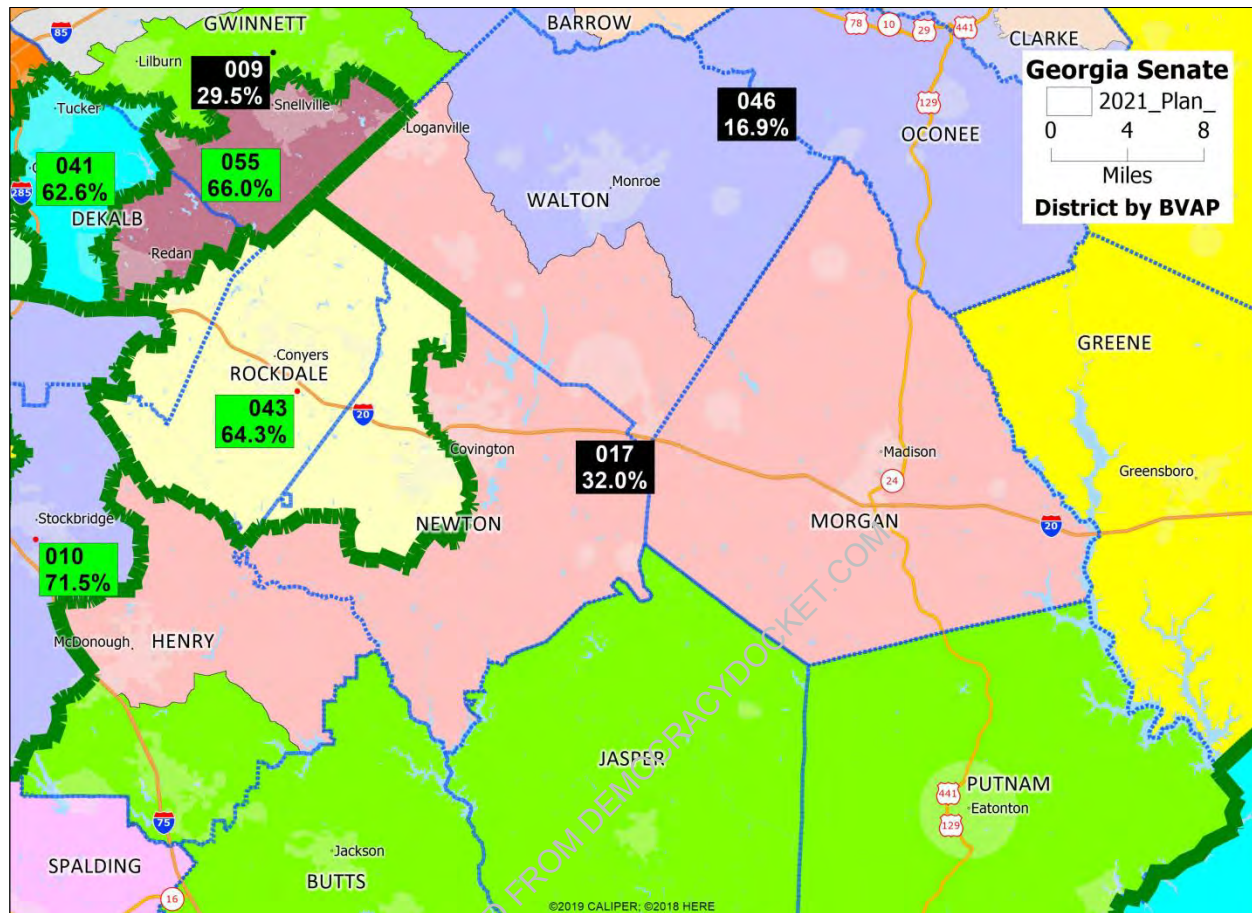
78. A majority-Black Senate District can be drawn around where 2021 Senate Plan District 16 was drawn by “unpacking” some of the Black population in neighboring Senate Districts 34 and 44 (which include parts of Clayton County as well as part of Fayette County in Senate District 34 and part of Dekalb County in Senate District 44). In the 2021 Senate Plan, those neighboring districts are drawn with around 70% and 65% BVAP. Unpacking those districts allows a majority-Black Illustrative Senate Plan District 28 to be drawn in Fayette, Spalding, and a neighboring part Clayton County (which has also seen 30% growth in its substantial Black population), “uncracking” the Black population that had been drawn into 2021 Senate Plan District 16.

Illustrative District 17 (**Exhibit Q-1**) and 2021 Plan District 17 (**Exhibit Q-2**)

**Figure 17:** *Illustrative District 17 and Vicinity*



79. An additional majority-Black State Senate district can be drawn around where Senate District 17 in the 2021 Senate Plan was drawn. Senate District 17 as drawn in the 2021 Senate Plan, includes parts of Henry, Newton, and Walton Counties, and all of Morgan County, and lies in the southeastern part of the Atlanta Metro area.

**Figure 18: 2021 Plan District 17 and Vicinity**

80. Of the counties in 2021 Senate District 17: Henry County's BVAP increased by almost 75% in the last decade (to nearly 60%) and Newton County's increased by more than 45% (to almost 50% of the total VAP of the county). Meanwhile, Dekalb and Rockdale Counties, which border Henry and Newton Counties, also have substantial Black populations. For example, Rockdale County is majority Black, and the county's BVAP increased by 53% over the last decade. Senate District 17 was nevertheless drawn in 2021 with a BVAP under 34%.

81. A majority-Black Senate District 17 can be drawn around where 2021 Senate Plan District 17 was drawn by “unpacking” the Black population in a number of neighboring districts, including 2021 Senate Plan Districts 10 and 43 (which include parts of Henry, Rockdale, and Newton Counties). Under the 2021 Senate Plan, those two districts were drawn with BVAPs of over 70% and almost 65%, respectively. Unpacking those districts allows a majority-Black Illustrative Senate Plan District 17 to be drawn in Henry as well as Rockdale and Dekalb Counties, “uncracking” the Black population in Henry County that had been drawn into 2021 Senate Plan District 17, which under the 2021 Senate Plan has been combined with predominantly White populations in Walton and Morgan Counties.<sup>20</sup>

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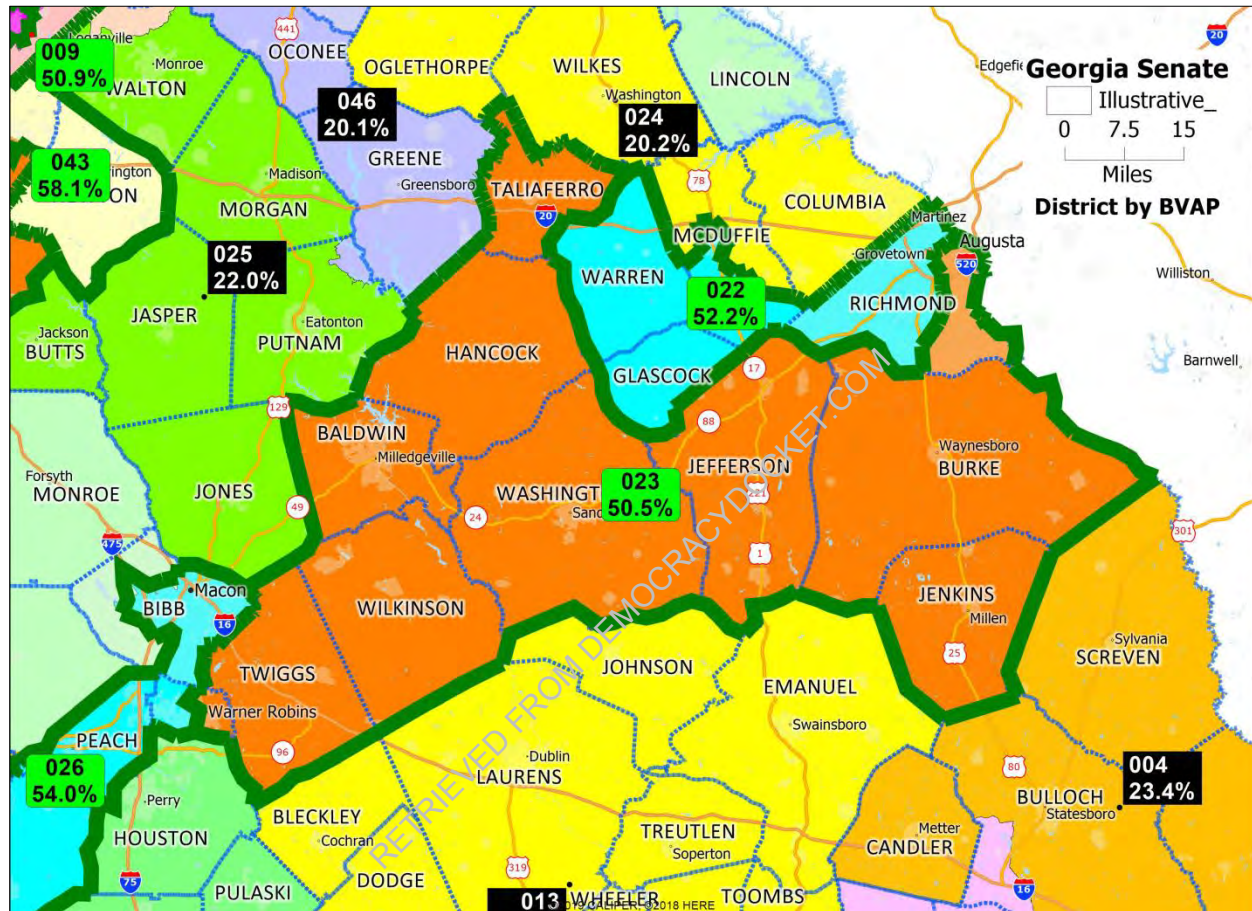
<sup>20</sup> In addition, the Illustrative Senate Plan places the booming Black population of Newton County in another majority-Black district, District 43.



**(2) Eastern Black Belt (Region B)**

Illustrative District 23 (**Exhibit R-1**) and 2021 Plan District 23 (**Exhibit R-2**)

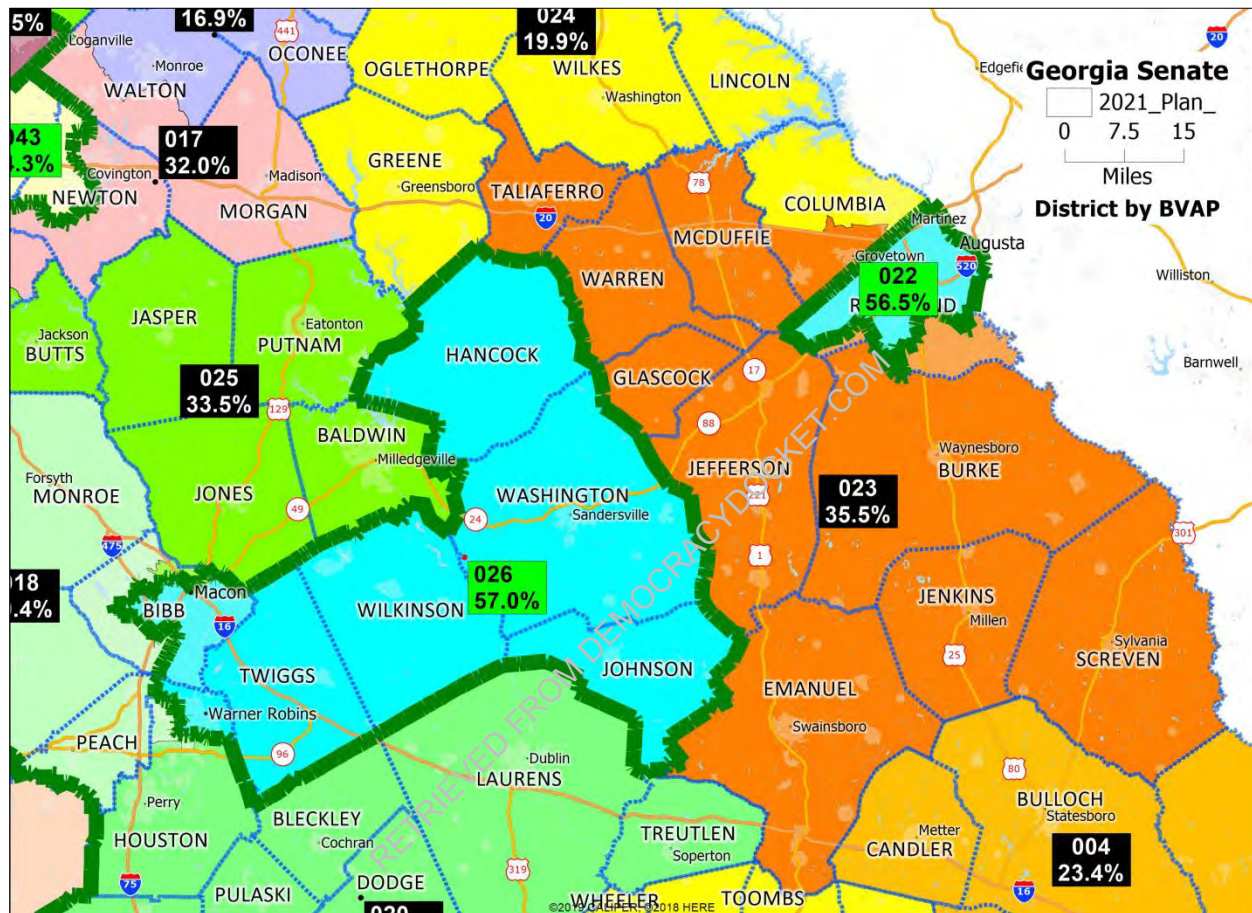
**Figure 19: Illustrative District 23 and Vicinity**



82. Another additional majority-Black State Senate district can be drawn around where Senate District 23 in the 2021 Senate Plan was drawn. Senate District 23 as drawn in the 2021 Senate Plan lies around the City of Augusta, including outlying parts of Richmond County and a number of surround Black Belt counties in the larger Augusta region, including Burke, Jefferson, Warren, and Taliaferro Counties. As noted already, the Black population in that region has increased,

although that growth has been offset by White population decline. Senate District 23 was drawn with a BVAP of under 36%.

**Figure 20: 2021 Plan District 23 and Vicinity**



83. An additional majority-Black State Senate district can be drawn in the Augusta region, around where SD 23 was drawn, by “unpacking” the Black population in Senate District 22 (central Augusta) and Senate District 26 (which includes adjacent Black Belt counties to the west, such as Hancock County) and by “uncracking” the Black populations in Senate District 23 and Senate District 25 (which includes additional contiguous Black Belt counties such as Baldwin

County). This more even distribution allows a majority-Black Illustrative Senate Plan District 23 to be drawn in the area including Richmond County and much of the Augusta-area Black Belt counties, “uncracking” the Black population that had been drawn into 2021 Senate Plan District 23.

### **C. Supplemental Plan Information**

84. Compactness scores for the Illustrative Senate Plan are within the norm. The **Exhibit S** series contains compactness scores generated by the software program Maptitude for Redistricting.

85. The table in **Figure 21** (condensed from the Exhibit S series) reports Reock<sup>21</sup> and Polsby-Popper<sup>22</sup> scores for the Illustrative Senate Plan (**Exhibit S-1**), alongside scores for the 2014 Benchmark Senate Plan (**Exhibit S-2**) and the 2021 Senate Plan (**Exhibit S-3**).

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<sup>21</sup> “The Reock test is an area-based measure that compares each district to a circle, which is considered to be the most compact shape possible. For each district, the Reock test computes the ratio of the area of the district to the area of the minimum enclosing circle for the district. The measure is always between 0 and 1, with 1 being the most compact. The Reock test computes one number for each district and the minimum, maximum, mean and standard deviation for the plan.” Caliper Corporation, *Maptitude For Redistricting* Software Documentation.

<sup>22</sup> The Polsby-Popper test computes the ratio of the district area to the area of a circle with the same perimeter:  $4\pi \text{Area}/(\text{Perimeter}^2)$ . The measure is always between 0 and 1, with 1 being the most compact. The Polsby-Popper test computes one number for each district and the minimum, maximum, mean and standard deviation for the plan. See Caliper Corporation, *Maptitude For Redistricting* Software Documentation.



**Figure 21**

**Compactness Scores – Illustrative Senate Plan and  
2014 Benchmark and 2021 Senate Plans**

	Reock			Polsby-Popper	
	Mean	Low		Mean	Low
<b>Illustrative Senate Plan</b>	.38	.17		.25	.11
<b>2014 Benchmark Senate Plan</b>	.43	.14		.27	.11
<b>2021 Senate Plan</b>	.42	.18		.29	.12

86. **Exhibit T-1** contains a county and VTD split report generated by Maptitude for all districts in the Illustrative Senate Plan. See also **Exhibit T-2** (2014 Benchmark Senate Plan) and **Exhibit T-3** (2021 Senate Plan).

87. County and VTD splits are within the norm for a typical legislative plan. The table in **Figure 22** summarizes county and 2020 VTD splits under the Illustrative Senate Plan, the 2014 Benchmark Senate Plan, and the 2021 Senate Plan.

**Figure 22**

**County and VTD Splits – Illustrative Plan versus  
2014 Benchmark and 2021 Senate Plans**

	County Splits (Populated)	Unique County- District Combinations	2020 VTD Splits (Populated)
<b>Illustrative Senate Plan</b>	33	59	54
<b>2014 Benchmark Senate Plan</b>	38	65	84
<b>2021 Senate Plan</b>	29	63	37



88. Based on incumbent address information obtained from the Redistricting Data Hub, the following districts in the Illustrative Senate Plan may have incumbent conflicts: 20 and 56.

89. Based on incumbent address information obtained from the Redistricting Data Hub, the following districts in the 2021 Senate Plan may have incumbent conflicts: 13 and 52.

#### **D. Online Interactive Map**

90. The Illustrative Senate Plan can also be viewed online in detail on the *Dave's Redistricting Application* (DRA) website via the link below.

<https://davesredistricting.org/join/f029239b-b5cc-444a-89cb-6409f92d8eb9>.

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## V. HOUSE – HISTORICAL BENCHMARK PLANS AND 2021 PLAN

### A. Majority-Black House Districts – 1990s Plan to 2021 Plan

91. As shown in **Figure 23**, and despite the significant growth in Georgia's Black population over the past two decades discussed earlier in this report, the number of majority-Black House districts has climbed by just five districts from 45 (25% of districts) in the 2006 plan to 49 (27.2%) in the 2021 Plan, and has remained more or less static for the last decade.

**Figure 23**

#### **Number of Majority- Black House Districts by Plan –2000 to 2021**

<b>House Plans</b>	<b>Statewide Majority-Black Districts</b>	<b>Metro Atlanta Majority-Black Districts</b>
1990s Plan – 2000 Census	37	22
2006 Plan – 2010 Census	45	30
2012 Plan – 2010 Census	48	32
2015 Plan – 2020 Census	47	31
2021 Plan – 2020 Census	49	33

92. Since the enactment of the 2006 Plan, just three majority-Black districts have been added in Metro Atlanta, even as the Black population in the 29-county area has climbed by over 400,00 persons—the equivalent of nearly seven House districts based on the 2020 ideal district size.

93. Despite the nominal increase in majority-Black House districts since 2006, **Figure 24** reveals that the percentage of Black Georgians of voting age in

majority-Black House districts is only slightly higher than in the 1990s (52% vs. 45%). Under the 2021 Plan, the percentage of the NH White population in majority-White districts is down from the 1990s (76% vs. 90%). Still, as with the Senate, given the 25-point Black-White gap, Black populations are disproportionately “cracked” or divided into majority-White districts in the House as well.

**Figure 24**

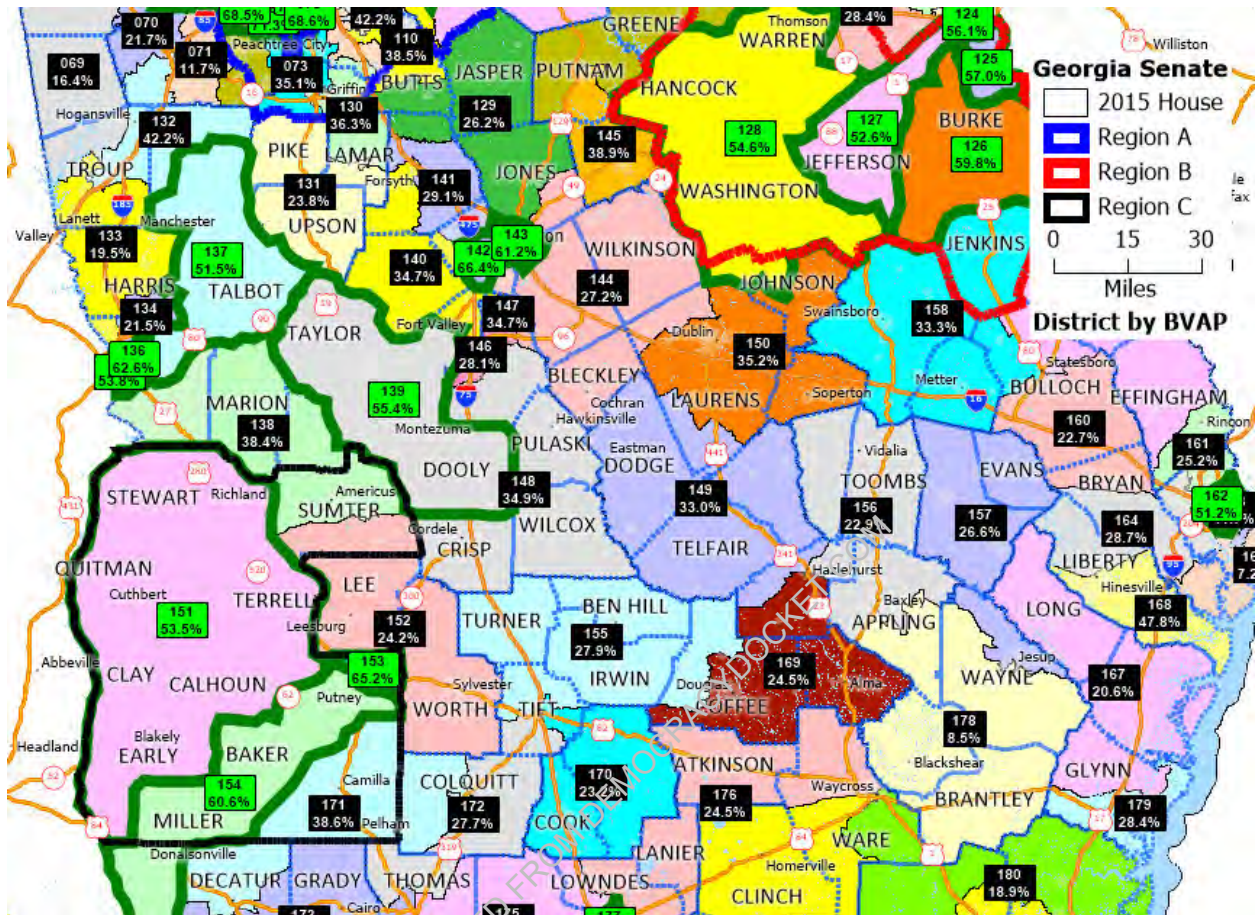
**Same Race VAP in Majority-Black and Majority NH White Districts—  
2000 to 2021**

<b>House Plans</b>	<b>Statewide % Black VAP in Majority- Black Districts*</b>	<b>Statewide %NH White VAP in Majority-White Districts</b>
1990s Plan – 2000 Census	44.81%	90.49%
2006 Plan – 2010 Census	44.61%	83.73%
2015 Plan – 2020 Census	47.94%	77.6%
2021 Plan – 2020 Census	51.65%	76.16%

\*Including Districts that are both BVAP- and BCVAP-majority.

**B. 2015 Benchmark House Plan**

94. The map in **Figure 25** displays 2015 Benchmark House Plan districts in south Metro Atlanta (Region A) and in the eastern and western Black Belt (Regions B and C). Labels on the map display the district number and the BVAP percentages, according to the 2020 Census. Green labels and borders identify majority-Black districts.

**Figure 25: 2015 Benchmark House Plan – Regions A, B, and C**

95. The map depicted in **Figure 25** is also included as **Exhibit U**.

96. **Exhibit V-1** contains a map packet depicting the Benchmark 2015 House Plan, with corresponding Census 2010 statistics, prepared by GLCRO. **Exhibit V-2** shows the map for the prior 2012-enacted House plan, and **Exhibit V-3** shows the map for the House plan enacted in 2006.

97. **Exhibit W-1** is a table reporting Census 2020 population statistics for the 180 districts in the 2015 Benchmark House Plan, as well as CVAP estimates

from the 5-year 2015-2019 Special Tabulation.<sup>23</sup> **Exhibits W-2** and **W-3** provide similar population information for the prior, 2012-enacted and 2006-enacted plans.

98. As a result of the dramatic population shifts in Georgia since 2010, the 2015 Benchmark House Plan is severely malapportioned, with an overall deviation of 56.66%, according to the 2020 Census.

99. The 2015 Benchmark House Plan contains 47 majority-Black districts, with 48 BCVAP-majority districts and 62 districts that are B+L+ACVAP majority.

100. For comparison with the Illustrative House Plan, additional 2015 Benchmark House Plan information regarding compactness scores, county splits, VTD splits, and incumbent conflicts is reported *infra*.

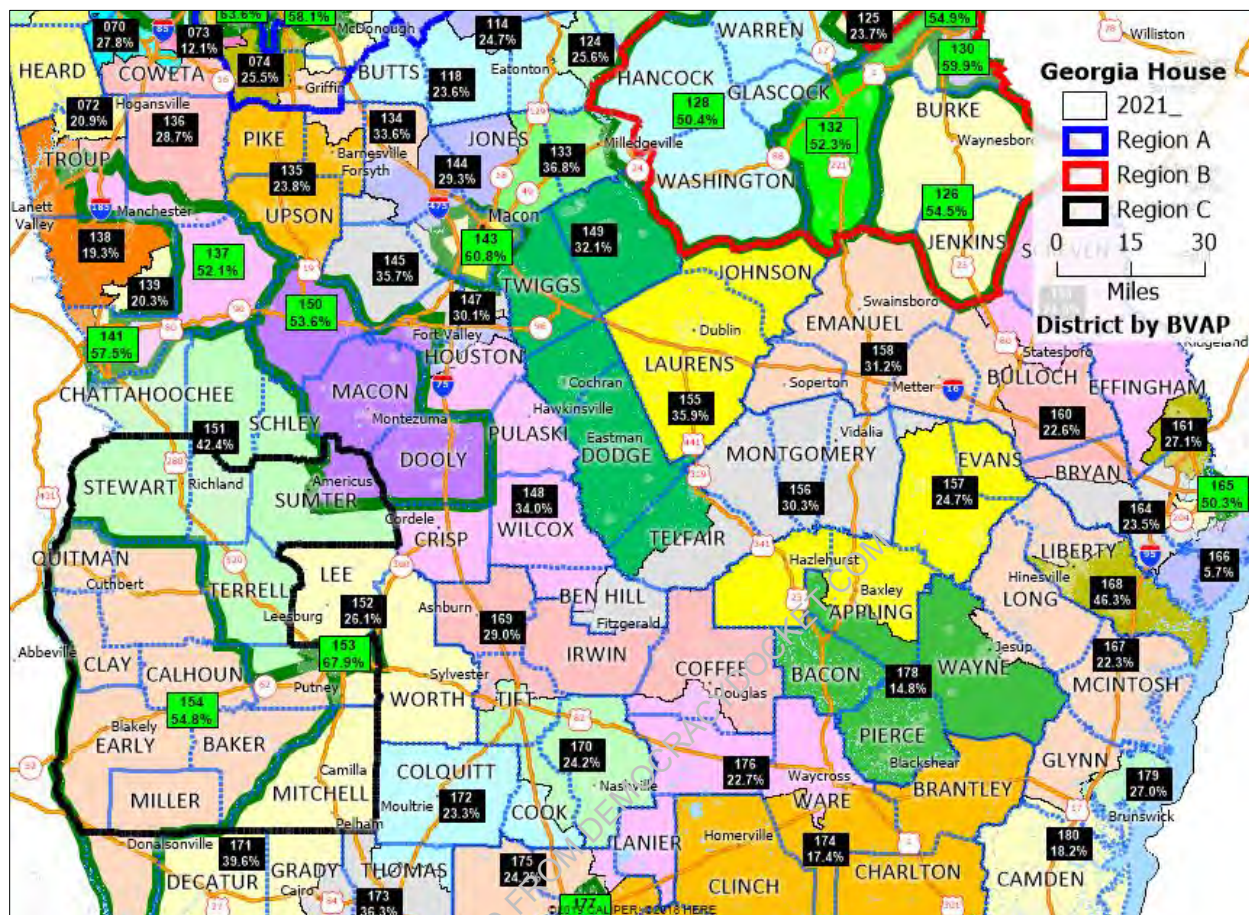
### **C. 2021 House Plan**

101. The map in **Figure 26** displays 2021 House Plan districts in south Metro Atlanta (Region A) and in the eastern and western Black Belt (Regions B and C). Green labels and borders identify majority-Black districts.

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<sup>23</sup> <https://www.census.gov/programs-surveys/decennial-census/about/voting-rights/cvap.html>.



**Figure 26: 2021 Plan – Regions A, B, and C**

102. A version of **Figure 26** is included as **Exhibit X**.

103. **Exhibit Y-1** contains a map packet depicting the 2021 House Plan, with corresponding Census 2020 statistics, prepared by GLCRO. **Exhibit Y-2** is a table reporting Census 2020 population statistics for the 180 districts in the 2021 House Plan, as well as CVAP estimates from the 5-year 2015-2019 Special Tabulation.

104. The 2021 House Plan contains 49 majority-Black districts, with 49 BCVAP-majority districts, and 47 that are both BVAP and BCVAP-majority. Sixty-two districts in the 2021 House Plan are majority B+L+ACVAP.

105. For comparison, additional 2021 House Plan information regarding compactness scores, county splits, VTD splits, and incumbent conflicts is reported *infra*.

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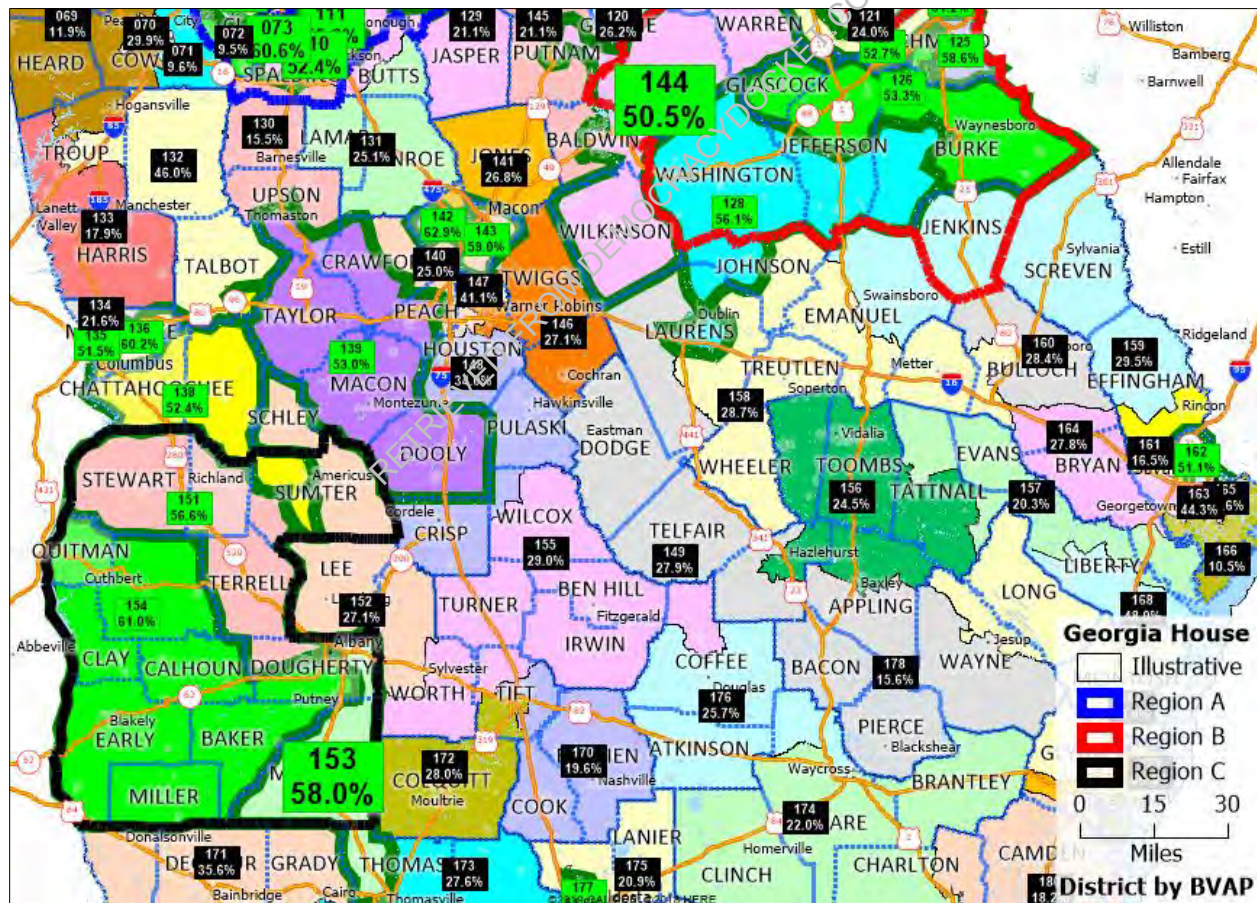
## VI. ILLUSTRATIVE HOUSE PLAN

### A. Statewide

106. The map in **Figure 27** displays Illustrative House Plan districts, with the map zoomed to identify additional majority Black districts (large green labels) in south Metro Atlanta (Region A) and in the Black Belt (Regions B and C).

**Exhibit Z-1** is a higher resolution version of the **Figure 27** map.

**Figure 27:** *Illustrative Plan – New Majority-Black Districts –73, 110, 111, 144, and 153*





107. **Exhibit Z-2** is a table reporting Census 2020 population statistics for the 180 districts in the Illustrative House Plan, as well as CVAP estimates from the 5-year 2015-2019 Special Tabulation.<sup>24</sup>

108. The Illustrative House Plan contains 54 majority-Black districts (BVAP), with 54 majority-BCVAP districts and 53 that are both BVAP and BCVAP-majority. Sixty-nine districts in the Illustrative House Plan are majority B+L+ACVAP.

109. **Exhibit AA** contains detailed maps for the 54 districts that are BVAP-majority under the Illustrative House Plan, including the additional majority-Black districts in the Illustrative Plan.

#### **B. Additional Majority Black Districts in the Illustrative Plan**

110. The text descriptions of four of the additional majority-Black districts in the Illustrative House Plan set forth below are illustrated with paired comparison map exhibits, depicting the Illustrative House Plan and 2021 House Plan at the same scale. For ease of reference, these side-by-side pairings are also included in Exhibits as marked below.

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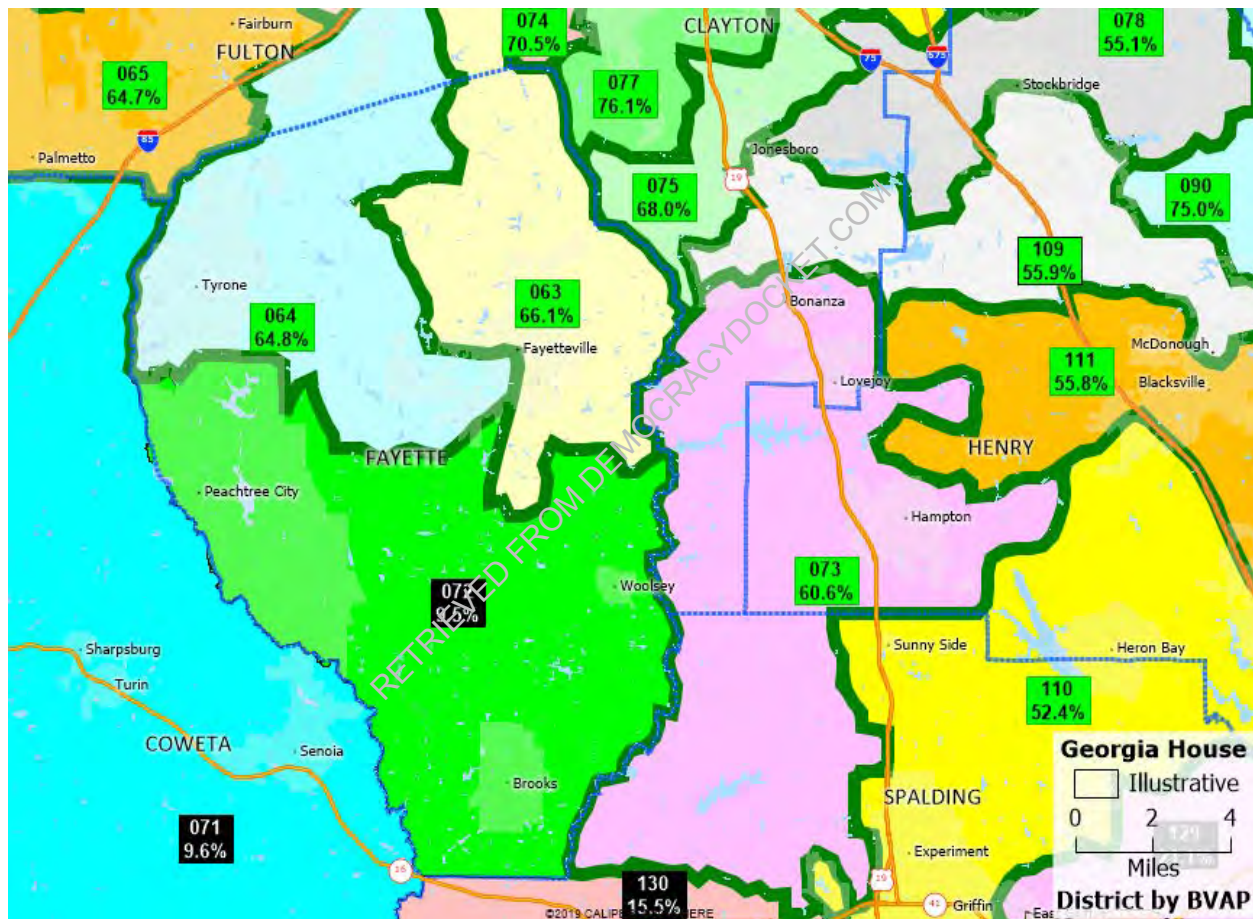
<sup>24</sup> <https://www.census.gov/programs-surveys/decennial-census/about/voting-rights/cvap.html>.

111. In these maps, majority-Black districts are outlined with bold green boundaries and green labels.

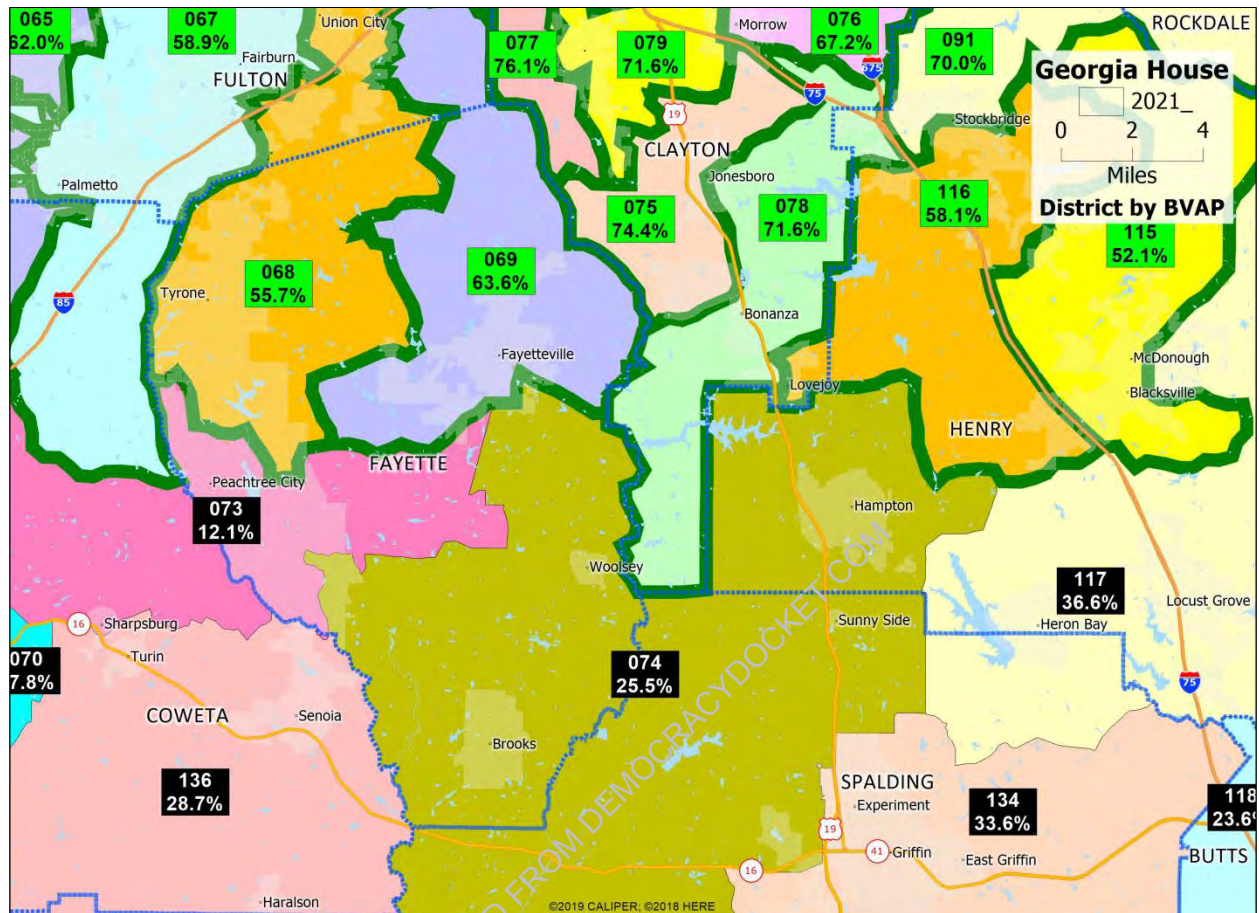
**(1) South Metro Atlanta (Region A)**

Illustrative District 73 (**Exhibit AB-1**) & 2021 Plan District 74 (**Exhibit AB-2**)

**Figure 28:** *Illustrative Plan District 73 and Vicinity*



112. House District 74 in the 2021 House Plan lies in the south Atlanta Metro area and includes parts of Fayette, Spalding, and Henry Counties. The BVAP of the district as drawn is under 26%.

**Figure 29: 2021 Plan District 74 and Vicinity**

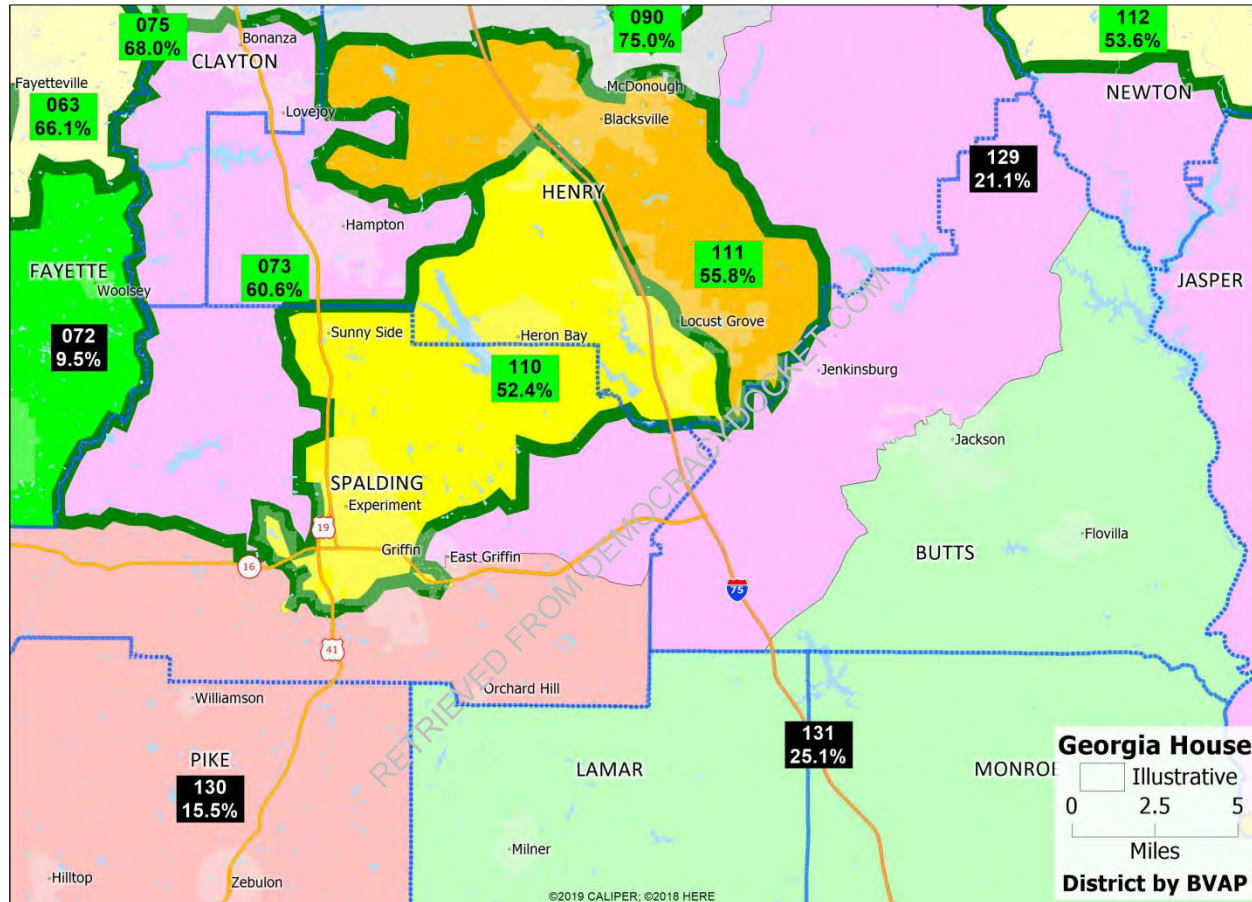
113. An additional majority-Black House District could have been drawn in that area by “unpacking” the Black population in (among others) 2021 House Plan District 78 (which stretches into Clayton County) and “uncracking” the Black population in House Districts 74 and 117, both of which include counties such as Henry County that have seen substantial Black population growth and are now themselves majority Black. Unpacking those districts allows a majority-Black



Illustrative House Plan District 73 to be drawn in Henry, Spalding, and a neighboring part of Clayton County.<sup>25</sup>

Illustrative District 110 (**Exhibit AC-1**) & 2021 Plan District 117 (**Exhibit AC-2**)

**Figure 30:** *Illustrative Plan: District 110 and vicinity*

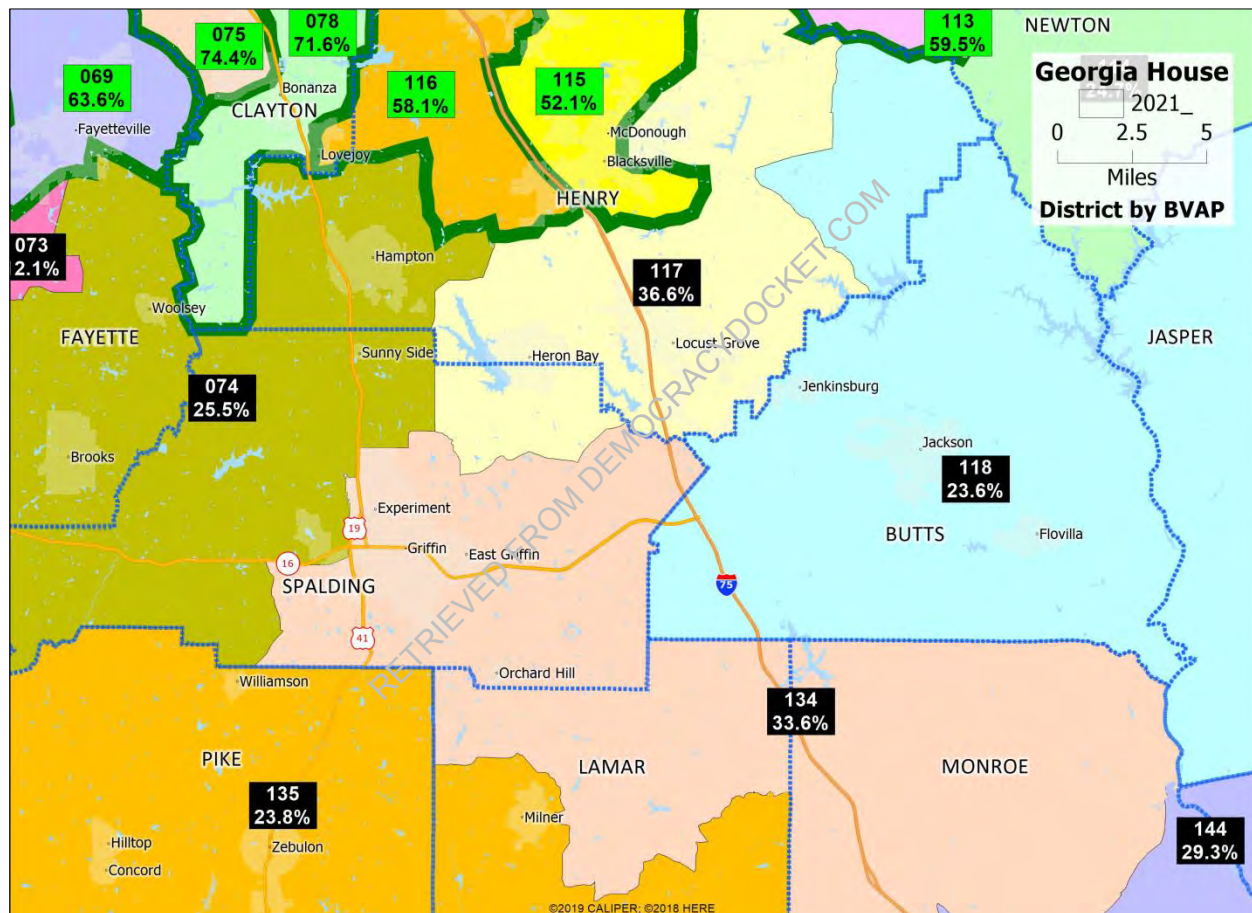


114. At least one additional majority-Black House district can be drawn around where House District 117 in the 2021 House Plan was drawn. House

<sup>25</sup> As shown on the **Figure 28** map, Illustrative House Plan District 109 in Henry and Clayton Counties is majority-BVAP (55.9%), but is just barely below the 50% BCVP threshold (49.97% BCPVAP).

District 117 in the 2021 House Plan lies in the south Atlanta Metro area and includes parts of Henry and Spalding Counties. The BVAP of the district as drawn is just under 37%, and the BVAP of the neighboring district that includes the rest of Spalding County, District 134, is just almost 34%.

**Figure 31: 2021 Plan: District 117 and Vicinity**



115. At least one additional majority-Black House District could have been drawn in that area by (among other things) “unpacking” the Black population in 2021 House Plan District 116 (which includes part of Henry County just to the north, closer in to the center of the Metro Atlanta area) and “uncracking” the Black

populations in House Districts 117 and 134, bringing more of the growing Black populations in Henry and Spalding Counties into majority-Black districts.

Unpacking those districts allows, among other things, for a majority-Black

Illustrative House Plan District 110 to be drawn in Henry and Spalding.<sup>26</sup>

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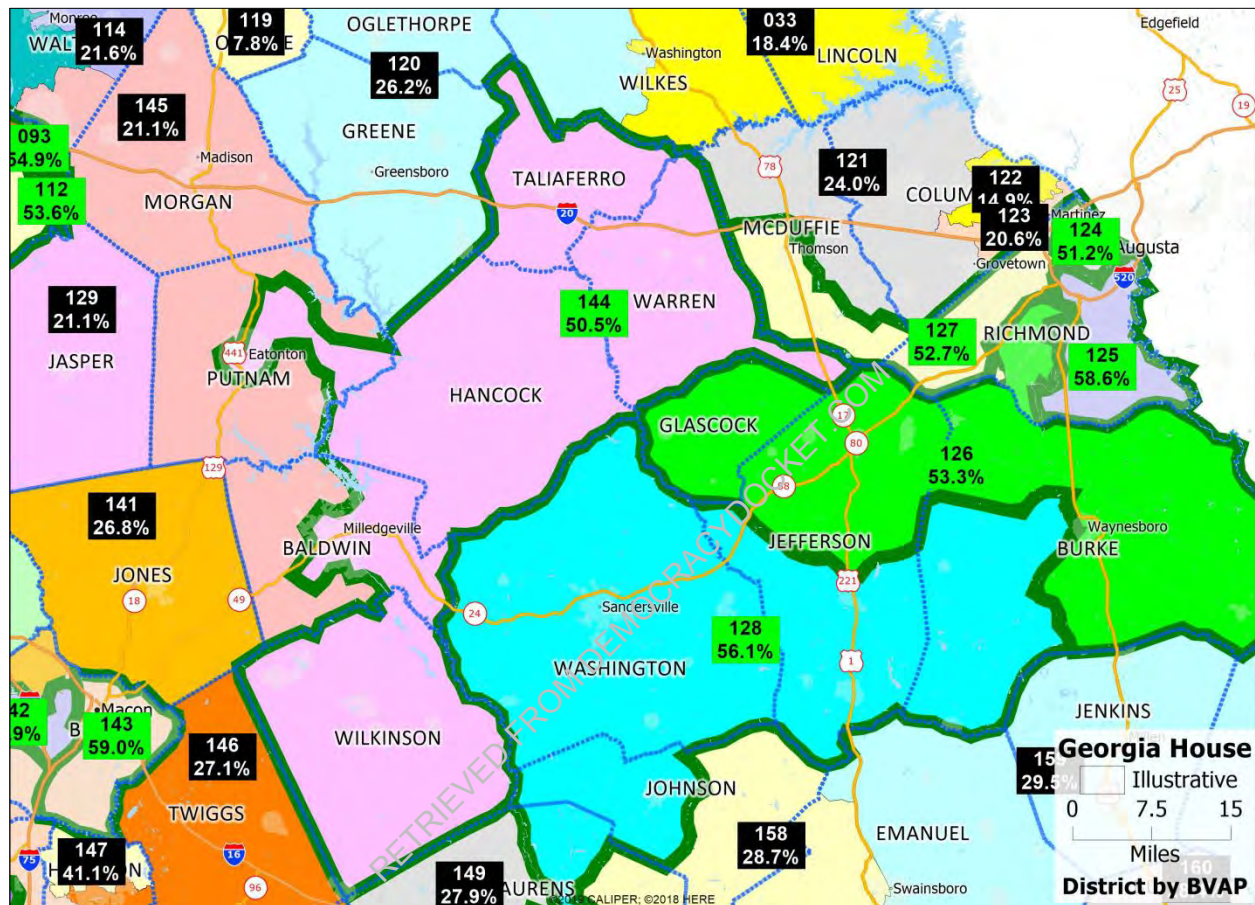
<sup>26</sup> The Illustrative House Plan includes another majority-Black district, which could be characterized as District 111, in Henry County, or District 112, in the area around Newton County near where 2021 House Plan District 114 was drawn. District 112 could have been drawn by “unpacking” the Black population in (among others) House District 92 (which includes parts of Rockdale and Dekalb counties) and thus “uncracking” the Black population in House District 114. Both districts are depicted in the **Exhibit AA** series.



**(2) Eastern Black Belt (Region B)**

Illustrative Plan District 144 (**Exhibit AD-1**) and 2021 Plan (**Exhibit AD-2**)

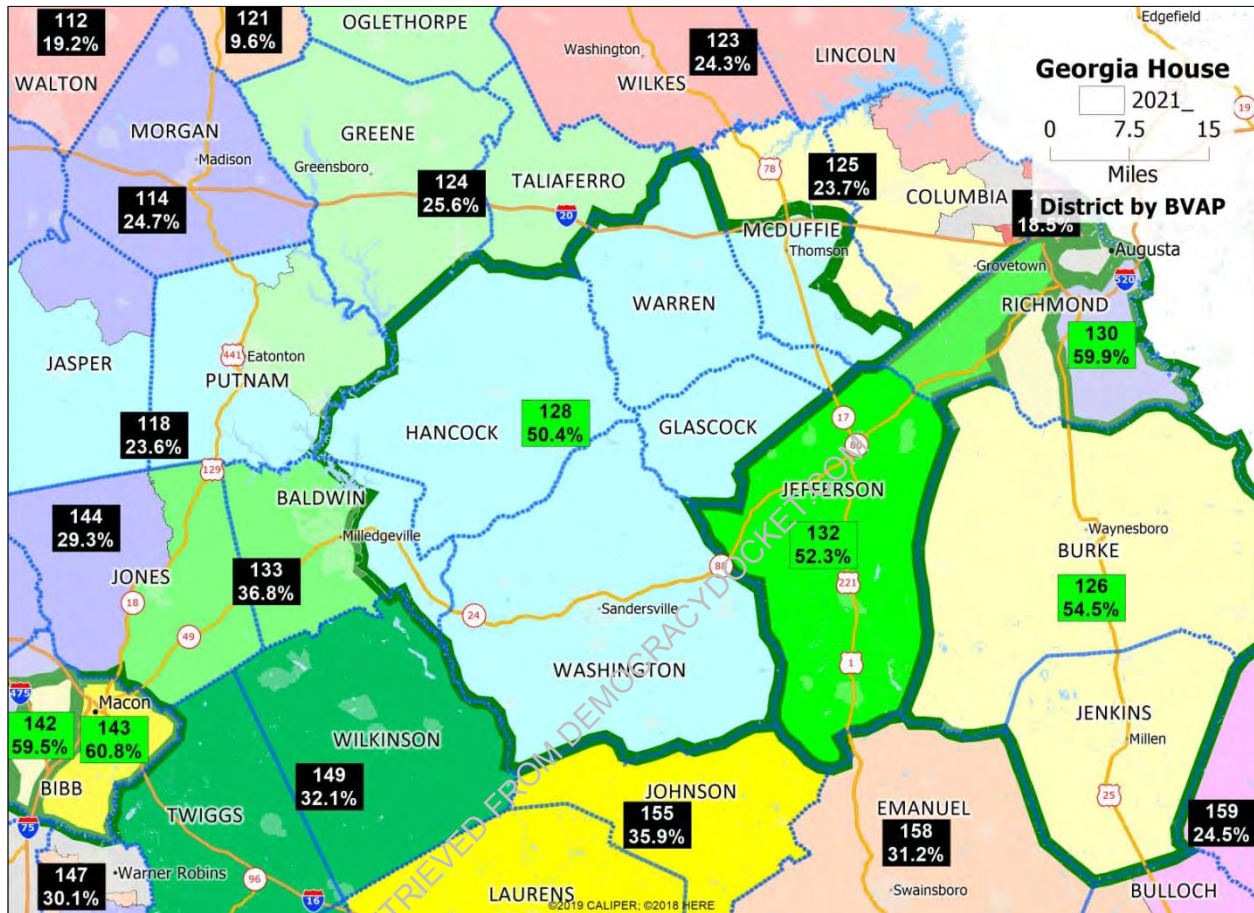
**Figure 32:** *Illustrative Plan: District 144 and Vicinity*



116. Another additional majority-Black House District could have been drawn in the area in and outside Augusta, including a number of Black Belt-area counties such as Baldwin, Wilkinson, and Taliaferro Counties that are included in non-majority-Black districts under the 2021 House Plan. In the 2021 House Plan, the area in and around Augusta includes five majority-Black districts: Districts 129 and 130 (both in Augusta entirely within

Richmond County), as well as Districts 128, 131, and 132.

**Figure 33: 2021 Plan: Districts 133, 149 and eastern Black Belt**



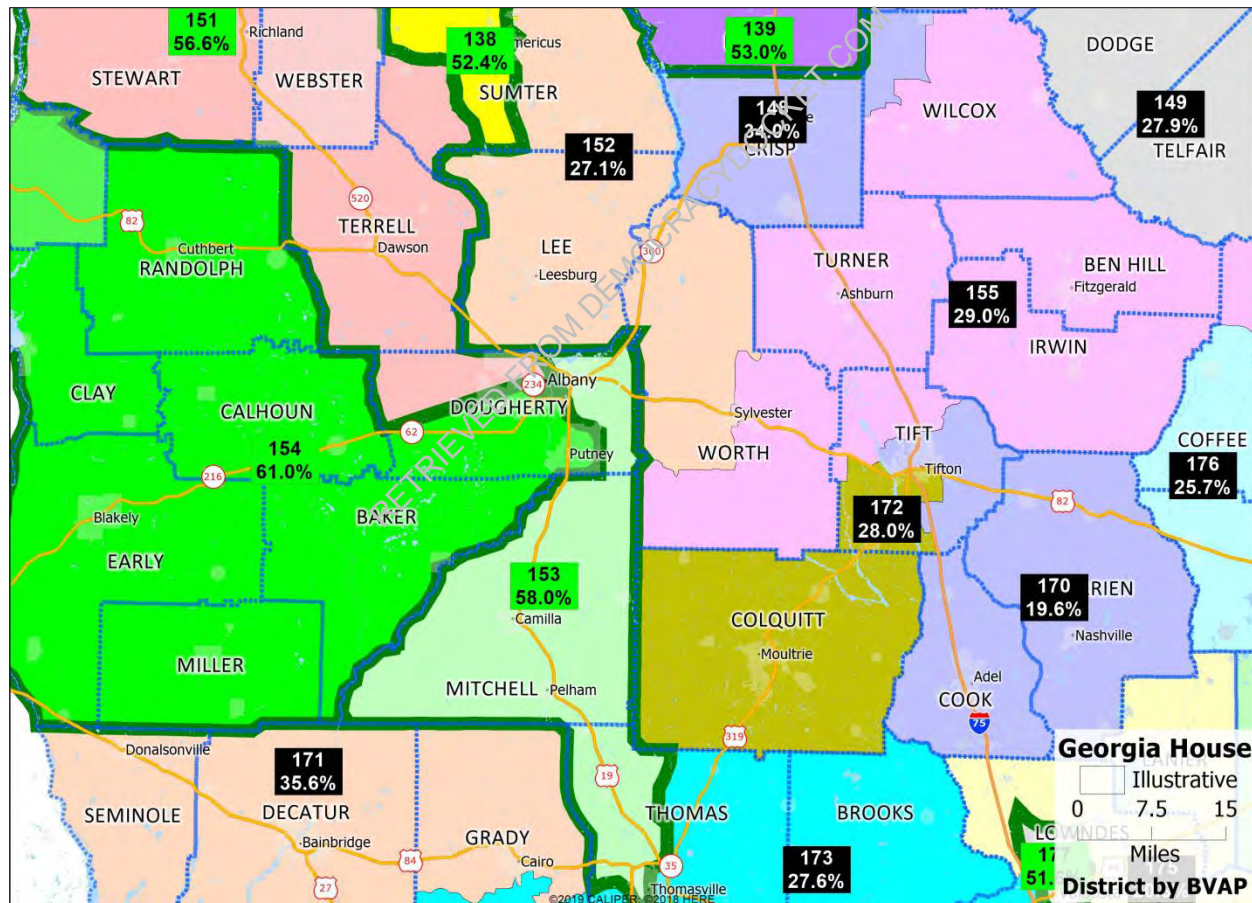


possible to draw six total majority-Black districts, as with Illustrative House Plan Districts 124, 125, 126, 127, 128, and 144. Illustrative House Plan District 144, in particular, includes substantial number of Black voters from the Augusta region who are spread across non-majority-Black districts in the 2021 House Plan.

### (3) Western Black Belt (Region C)

Illustrative District 153 (**Exhibit AE-1**) and 2021 Plan District 171 (**Exhibit AE-2**)

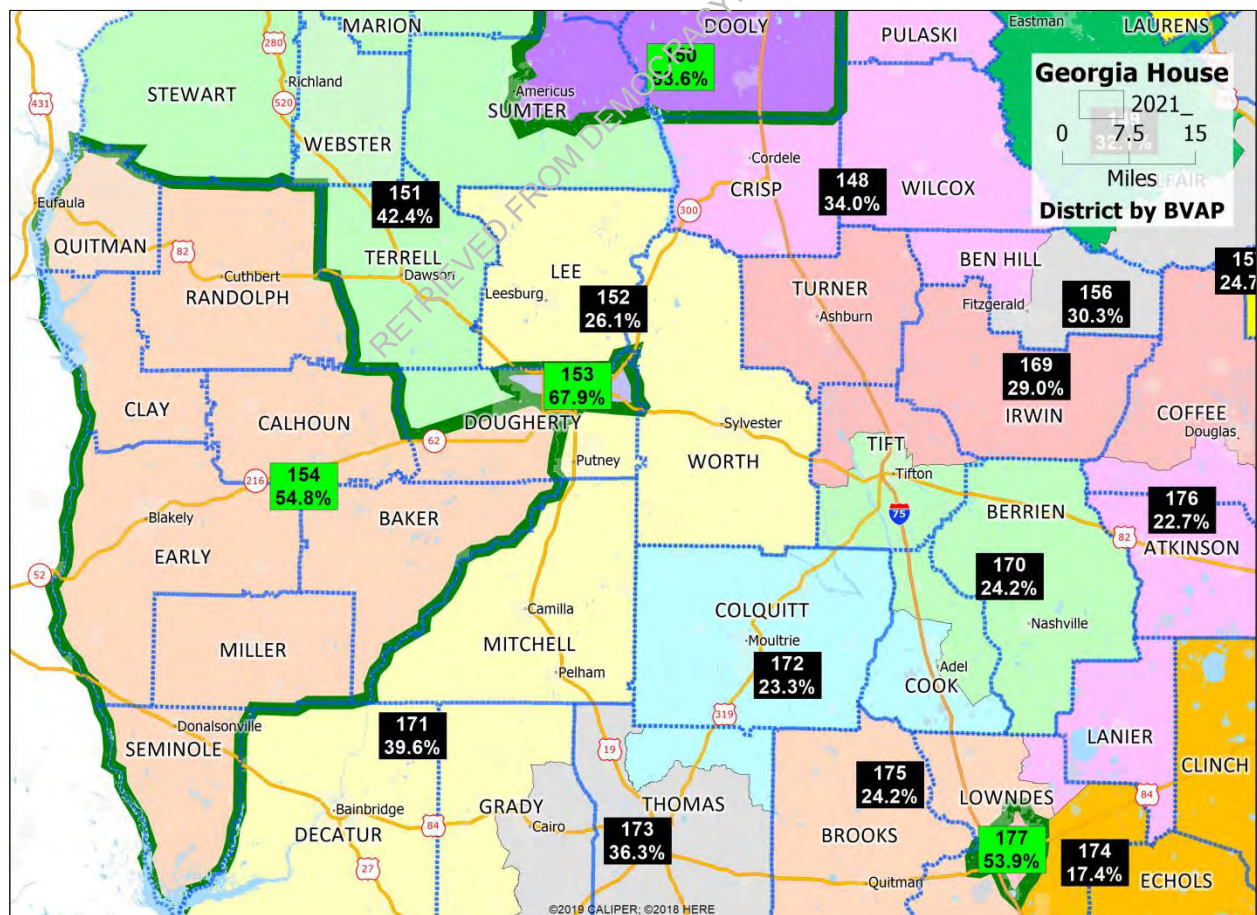
**Figure 34:** *Illustrative Plan: District 153 and vicinity*



118. An additional majority-Black House District could also have been drawn in the area south of Albany, including Dougherty, Mitchell, and Thomas

Counties, all of which are in the southwestern portion of the Black Belt, near where House District 171 in the 2021 House Plan was drawn. The BVAP of 2021 House Plan District 171, which contains Mitchell County, is just under 40%. In addition, the BVAP of neighboring 2021 House Plan District 173, which includes Thomas County, is similarly just over 36%. And nearby Dougherty County, which contains the majority-Black City of Albany, is split among four districts in the 2021 House Plan, two of which (2021 House Plan Districts 151 and 152) have no Black majority, and one of which (2021 House Plan District 153) is nearly 70% Black.

**Figure 35: 2021 Plan: District 151, 153, 171 and Vicinity**



119. In sum, another additional majority-Black House District could have drawn in southwest Georgia by “unpacking” the Black population in 2021 House Plan District 153 and “uncracking” the Black populations in 2021 House Plan Districts 171 and 173. Unpacking those districts allows a majority-Black Illustrative House Plan District 153 to be drawn including part of Dougherty, Mitchell, and Thomas Counties.

120. Looking at the southwest Georgia/western Black Belt region as a whole, it is possible to draw seven total majority-Black districts, as with Illustrative House Plan Districts 135, 136, 138, 139, 151, 153, and 154. However, the 2021 House Plan contains only six: 2021 House Plan Districts 137, 140, 141, 150, 153, and 154.

### **C. Supplemental Plan Information**

121. Compactness scores for the Illustrative House Plan are within the norm. **Exhibits BB-1** contains compactness scores generated by Maptitude for all districts in the Illustrative House Plan, alongside scores for the 2015 Benchmark House Plan (**Exhibit BB-2**) and the 2021 House Plan (**Exhibit BB-3**).

122. The table in **Figure 36** (condensed from the **Exhibit BB** series) reports Reock and Polsby-Popper scores for the Illustrative House Plan, alongside scores for the 2015 Benchmark House Plan and the 2021 House Plan.



**Figure 36**

**Compactness Scores – Illustrative House Plan vs 2014 Benchmark  
and 2021 House Plans**

	Reock			Polsby-Popper	
	Mean	Low		Mean	Low
<b>Illustrative House Plan</b>	.39	.16		.27	.11
<b>2014 Benchmark House Plan</b>	.39	.13		.27	.09
<b>2021 House Plan</b>	.39	.12		.28	.10

123. In my experience, the compactness scores for the Illustrative Plan are clearly within the normal range for a state legislative plan.

124. County and VTD splits are also within the norm for a typical legislative plan. The table in **Figure 37** summarizes county and 2020 VTD splits under the Illustrative Plan, the 2015 Plan, and the 2021 Plan.

**Figure 37**

**County and VTD Splits – Illustrative Plan vs 2006 and 2015 Plans**

	County Splits (Populated)	Unique County- District Combinations	2020 VTD Splits (Populated)
<b>Illustrative House Plan</b>	74	206	262
<b>2015 Benchmark House Plan</b>	73	215	232
<b>2021 House Plan</b>	70	211	179

125. **Exhibit AF-1** contains a county and VTD split report generated by Maptitude for all districts in the Illustrative House Plan. *See also* **Exhibit AF-2** (2015 Benchmark House Plan) and **Exhibit AF-3** (2021 House Plan).

126. Based on incumbent address information obtained from the Redistricting Data Hub<sup>27</sup>, the following 8 districts in the Illustrative House Plan may have incumbent conflicts: 015, 029, 138, 141, 148, 149, 154, and 173.

127. Based on incumbent address information obtained from the Redistricting Data Hub, the following 15 districts in the 2021 House Plan may have incumbent conflicts: 019, 021, 031, 045, 054, 062, 087, 100, 101, 106, 118, 132, 133, 154, and 176.

128. **Exhibit AG-1** contains a table showing the district number for all Senate incumbents under the 2014 Benchmark, 2021, and Illustrative Senate Plans.

**Exhibit AG-2** contains a table showing the district number for all House incumbents under the 2015 Benchmark, 2021, and Illustrative House Plans

#### **D. Illustrative Plan – Online Interactive Map**

129. The Illustrative Plan can also be viewed online in detail on the *Dave's Redistricting Application* (DRA) website via the link below.

<https://davesredistricting.org/join/360e975b-5f46-47f3-bb2e-37385155f028>

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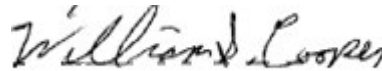
<sup>27</sup> <https://redistrictingdatahub.org/dataset/2021-ga-state-senate-incumbent-addresses/>.

###

I reserve the right to continue to supplement my declaration in light of additional facts, testimony and/or materials that may come to light.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury of the laws of the United States that the foregoing is true and correct according to the best of my knowledge, information and belief.

Executed on January 7, 2022:

A handwritten signature in cursive script, appearing to read "William S. Cooper".

---

WILLIAM S. COOPER

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# EXHIBIT A

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October 31, 2021

*William S. Cooper*  
*P.O. Box 16066*  
*Bristol, VA 24209*  
*276-669-8567*  
*bcooper@msn.com*

### **Summary of Redistricting Work**

I have a B.A. in Economics from Davidson College in Davidson, North Carolina.

Since 1986, I have prepared proposed redistricting maps of approximately 750 jurisdictions for Section 2 litigation, Section 5 comment letters, and for use in other efforts to promote compliance with the Voting Rights Act of 1965. I have analyzed and prepared election plans in over 100 of these jurisdictions for two or more of the decennial censuses – either as part of concurrent legislative reapportionments or, retrospectively, in relation to litigation involving many of the cases listed below.

From 1986 to 2020, I have prepared election plans for Section 2 litigation in Alabama, Connecticut, Florida, Georgia, Louisiana, Maryland, Mississippi, Missouri, Montana, Nebraska, New Jersey, New York, North Carolina, Ohio, Pennsylvania, South Carolina, South Dakota, Tennessee, Texas, Utah, Virginia, Washington, and Wyoming.

### **Post-2010 Redistricting Experience**

Since the release of the 2010 Census in February 2011, I have developed statewide legislative plans on behalf of clients in nine states (Alabama, Connecticut, Florida, Georgia, Kentucky, Mississippi, South Carolina, Texas, and Virginia), as well as over 150 local redistricting plans in approximately 30 states – primarily for groups working to protect minority voting rights. In addition, I have prepared congressional plans for clients in eight states (Alabama, Florida, Georgia, Louisiana, Maryland, Ohio, Pennsylvania, South Carolina, and Virginia).



October 31, 2021

In March 2011, I was retained by the Sussex County, Virginia Board of Supervisors and the Bolivar County, Mississippi Board of Supervisors to draft new district plans based on the 2010 Census. In the summer of 2011, both counties received Section 5 preclearance from the U.S. Department of Justice (DOJ).

Also in 2011, I was retained by way of a subcontract with Olmedillo X5 LLC to assist with redistricting for the Miami-Dade County, Florida Board of Commissioners and the Miami-Dade, Florida School Board. Final plans were adopted in late 2011 following public hearings.

In the fall of 2011, I was retained by the City of Grenada, Mississippi to provide redistricting services. The ward plan I developed received DOJ preclearance in March 2012.

In 2012 and 2013, I served as a redistricting consultant to the Tunica County, Mississippi Board of Supervisors and the Claiborne County, Mississippi Board of Supervisors.

In *Montes v. City of Yakima* (E.D. Wash. Feb. 17, 2015) the court adopted, as a remedy for the Voting Rights Act Section 2 violation, a seven single-member district plan that I developed for the Latino plaintiffs. I served as the expert for the Plaintiffs in the liability and remedy phases of the case.

In *Pope v. Albany County* (N.D.N.Y. Mar. 24, 2015), the court approved, as a remedy for a Section 2 violation, a plan drawn by the defendants, creating a new Black-majority district. I served as the expert for the Plaintiffs in the liability and remedy phases of the case.

In 2016, two redistricting plans that I developed on behalf of the plaintiffs for consent decrees in Section 2 lawsuits in Georgia were adopted (*NAACP v. Fayette County, Georgia* and *NAACP v. Emanuel County, Georgia*).

October 31, 2021

In 2016, two federal courts granted summary judgment to the plaintiffs based in part on my *Gingles 1* testimony: *Navajo Nation v. San Juan County, Utah* (C.D. Utah 2016) and *NAACP v. Ferguson-Florissant School District, Missouri* (E. D. Mo. August 22, 2016).

Also in 2016, based in part on my analysis, the City of Pasco, Washington admitted to a Section 2 violation. As a result, in *Glatt v. City of Pasco* (E.D. Wash. Jan. 27, 2017), the court ordered a plan that created three Latino majority single-member districts in a 6 district, 1 at-large plan.

In 2018, I served as the redistricting consultant to the Governor Wolf interveners at the remedial stage of *League of Women Voters, et al. v. Commonwealth of Pennsylvania*.

In August 2018, the Wenatchee City Council adopted a hybrid election plan that I developed – five single-member districts with two members at-large. The Wenatchee election plan is the first plan adopted under the Washington Voting Rights Acts of 2018.

In February 2019, a federal court ruled in favor of the plaintiffs in a Section 2 case regarding Senate District 22 in Mississippi, based in part on my *Gingles 1* testimony in *Thomas v. Bryant* (S.D. Ms. Feb 16, 2019).

In the summer of 2019, I developed redistricting plans for the Grand County (Utah) Change of Form of Government Study Committee.

In the fall of 2019, a redistricting plan I developed for a consent decree involving the Jefferson County, Alabama Board of Education was adopted *Traci Jones, et al. v. Jefferson County Board of Education, et al.*

In May 2020, a federal court ruled in favor of the plaintiffs in a Section 2 case in *NAACP et al. v. East Ramapo Central School District, NY*, based in part on my *Gingles 1* testimony. In October 2020, the federal court adopted a consent decree plan I developed for elections to be held in February 2021.

October 31, 2021

In May and June of 2020, I served as a consultant to the City of Quincy, Florida – the Defendant in a Section 2 lawsuit filed by two Anglo voters (*Baroody v. City of Quincy*). The federal court for the Northern District of Florida ruled in favor of the Defendants. The Plaintiffs voluntarily dismissed the case.

In the summer of 2020, I provided technical redistricting assistance to the City of Chestertown, Maryland.

I am currently a redistricting consultant and expert for the plaintiffs in *Jayla Allen v. Waller County, Texas*. I testified remotely at trial in October 2020.

Since 2011, I have served as a redistricting and demographic consultant to the Massachusetts-based Prison Policy Initiative for a nationwide project to end prison-based gerrymandering. I have analyzed proposed and adopted election plans in about 25 states as part of my work.

In 2018 (Utah) and again in 2020 (Arizona), I have provided technical assistance to the Rural Utah Project for voter registration efforts on the Navajo Nation Reservation.

### **Post-2010 Demographics Experience**

My trial testimony in Section 2 lawsuits usually includes presentations of U.S. Census data with charts, tables, and/or maps to demonstrate socioeconomic disparities between non-Hispanic Whites and racial or ethnic minorities.

I served as a demographic expert for plaintiffs in four state-level voting cases related to the Covid-19 pandemic (South Carolina, Alabama, and Louisiana) and state court in North Carolina.

I have also served as an expert witness on demographics in non-voting trials. For example, in an April 2017 opinion in *Stout v. Jefferson County Board of Education* (Case no.2:65-cv-00396-MHH), a school desegregation case involving the City of Gardendale,

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Ala., the court made extensive reference to my testimony.

I provide technical demographic and mapping assistance to the Food Research and Action Center (FRAC) in Washington D.C and their constituent organizations around the country. Most of my work with FRAC involves the Summer Food Program and Child and Adult Care Food Program. Both programs provide nutritional assistance to school-age children who are eligible for free and reduced price meals. As part of this project, I developed an online interactive map to determine site eligibility for the two programs that has been in continuous use by community organizations and school districts around the country since 2003. The map is updated annually with new data from a Special Tabulation of the American Community Survey prepared by the U.S. Census Bureau for the Food and Nutrition Service of the U.S. Department of Agriculture.

#### **Historical Redistricting Experience**

In the 1980s and 1990s, I developed voting plans in about 400 state and local jurisdictions – primarily in the South and Rocky Mountain West. During the 2000s and 2010s, I prepared draft election plans involving about 350 state and local jurisdictions in 25 states. Most of these plans were prepared at the request of local citizens' groups, national organizations such as the NAACP, tribal governments, and for Section 2 or Section 5 litigation.

Election plans I developed for governments in two counties – Sussex County, Virginia and Webster County, Mississippi – were adopted and precleared in 2002 by the U.S. Department of Justice. A ward plan I prepared for the City of Grenada, Mississippi was precleared in August 2005. A county supervisors' plan I produced for Bolivar County, Mississippi was precleared in January 2006.

In August 2005, a federal court ordered the State of South Dakota to remedy a

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Section 2 voting rights violation and adopt a state legislative plan I developed (*Bone Shirt v. Hazeltine*).

A county council plan I developed for Native American plaintiffs in a Section 2 lawsuit (*Blackmoon v. Charles Mix County*) was adopted by Charles Mix County, South Dakota in November 2005. A plan I drafted for Latino plaintiffs in Bethlehem, Pennsylvania (*Pennsylvania Statewide Latino Coalition v. Bethlehem Area School District*) was adopted in March 2009. Plans I developed for minority plaintiffs in Columbus County, North Carolina and Montezuma- Cortez School District in Colorado were adopted in 2009.

Since 1986, I have testified at trial as an expert witness on redistricting and demographics in federal courts in the following voting rights cases (approximate most recent testimony dates are in parentheses). I also filed declarations and was deposed in most of these cases.

#### **Alabama**

*Chestnut v. Merrill* (2019)

*Alabama State Conference of the NAACP v. Alabama* (2018)

*Alabama Legislative Black Caucus et al. v. Alabama et al.* (2013)

#### **Colorado**

*Cuthair v. Montezuma-Cortez School Board* (1997)

#### **Florida**

*Baroody v. City of Quincy* (2020)

#### **Georgia**

*Cofield v. City of LaGrange* (1996)

*Love v. Deal* (1995)

*Askew v. City of Rome* (1995)

*Woodard v. Lumber City* (1989)

#### **Louisiana**

*Terrebonne Parish NAACP v. Jindal, et al.* (2017)

*Wilson v. Town of St. Francisville* (1996)

*Reno v. Bossier Parish* (1995)

*Knight v. McKeithen* (1994)

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**Maryland**

*Cane v. Worcester County* (1994)

**Mississippi**

*Thomas v. Bryant* (2019)

*Fairley v. Hattiesburg* (2014)

*Boddie v. Cleveland School District* (2010)

*Fairley v. Hattiesburg* (2008)

*Boddie v. Cleveland* (2003)

*Jamison v. City of Tupelo* (2006)

*Smith v. Clark* (2002)

*NAACP v. Fordice* (1999)

*Addy v Newton County* (1995)

*Ewing v. Monroe County* (1995)

*Gunn v. Chickasaw County* (1995)

*Nichols v. Okolona* (1995)

**Montana**

*Old Person v. Brown (on remand)* (2001)

*Old Person v. Cooney* (1998)

**Missouri**

*Missouri NAACP v. Ferguson-Florissant School District* (2016)

**Nebraska**

*Stabler v. Thurston County* (1995)

**New York**

*NAACP v. East Ramapo Central School District* (2020)

*Pope v. County of Albany* (2015)

*Arbor Hills Concerned Citizens v. Albany County* (2003)

**Ohio**

*A. Philip Randolph Institute, et al. v. Ryan* (2019)

**South Carolina**

*Smith v. Beasley* (1996)

**South Dakota**

*Bone Shirt v. Hazeltine* (2004)

*Cottier v. City of Martin* (2004)

**Tennessee**

*Cousins v. McWherter* (1994)

*Rural West Tennessee African American Affairs Council v. McWherter* (1993)

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**Texas**

*Jayla Allen v. Waller County, Texas*

**Utah**

*Navajo Nation v. San Juan County (2017)*, brief testimony –11 declarations, 2 depositions

**Virginia**

*Smith v. Brunswick County (1991)*

*Henderson v. Richmond County (1988)*

*McDaniel v. Mehfoud (1988)*

*White v. Daniel (1989)*

**Wyoming**

*Large v. Fremont County (2007)*

In addition, I have filed expert declarations or been deposed in the following cases that did not require trial testimony. The dates listed indicate the deposition date or date of last declaration or supplemental declaration:

**Alabama**

*People First of Alabama v. Merrill (2020)*, Covid-19 demographics only

*Alabama State NAACP v. City of Pleasant Grove (2019)*

*James v. Jefferson County Board of Education (2019)*

*Voketz v. City of Decatur (2018)*

**Arkansas**

*Mays v. Thurston (2020)*-- Covid-19 demographics only)

**Connecticut**

*NAACP v. Merrill (2020)*

**Florida**

*Florida State Conference of the NAACP v. Lee, et al, (2021)*

*Calvin v. Jefferson County (2016)*

*Thompson v. Glades County (2001)*

*Johnson v. DeSoto County (1999)*

*Burton v. City of Belle Glade (1997)*

**Georgia**

*Dwight v. Kemp (2018)*

*Georgia NAACP et al. v. Gwinnett County, GA (2018)*

*Georgia State Conference NAACP et al v. Georgia (2018)*

*Georgia State Conference NAACP, et al. v. Fayette County (2015)*

*Knighton v. Dougherty County (2002)*

*Johnson v. Miller (1998)*



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*Jones v. Cook County (1993)*

**Kentucky**

*Herbert v. Kentucky State Board of Elections (2013)*

**Louisiana**

*Power Coalition for Equity and Justice v. Edwards (2020)*, Covid-19 demographics only

*Johnson v. Ardoin (2019)*

*NAACP v. St. Landry Parish Council (2005)*

*Prejean v. Foster (1998)*

*Rodney v. McKeithen (1993)*

**Maryland**

*Benisek v. Lamone (2017)*

*Fletcher v. Lamone (2011)*

**Mississippi**

*Partee v. Coahoma County (2015)*

*Figgs v. Quitman County (2015)*

*West v. Natchez (2015)*

*Williams v. Bolivar County (2005)*

*Houston v. Lafayette County (2002)*

*Clark v. Calhoun County (on remand)(1993)*

*Teague v. Attala County (on remand)(1993)*

*Wilson v. Clarksdale (1992)*

*Stanfield v. Lee County(1991)*

**Montana**

*Alden v. Rosebud County (2000)*

**North Carolina**

*Lewis v. Alamance County (1991)*

*Gause v. Brunswick County (1992)*

*Webster v. Person County (1992)*

**Rhode Island**

*Davidson v. City of Cranston (2015)*

**South Carolina**

*Thomas v. Andino (2020)*, Covid-19 demographics only

*Vander Linden v. Campbell (1996)*

**South Dakota**

*Kirkie v. Buffalo County (2004)*

*Emery v. Hunt (1999)*

**Tennessee**

*NAACP v. Frost, et al. (2003)*

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**Virginia**

*Moon v. Beyer (1990)*

**Washington**

*Glatt v. City of Pasco (2016)*

*Montes v. City of Yakima (2014)*

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# EXHIBIT B

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## **Exhibit B – Methodology and Sources**

1. In the preparation of this report, I analyzed population and geographic data from the Decennial Census and the American Community Survey.

2. For my redistricting analysis, I used a geographic information system (GIS) software package called *Maptitude for Redistricting*, developed by the Caliper Corporation. This software is deployed by many local and state governing bodies across the country for redistricting and other types of demographic analysis.

3. The geographic boundary files that I used with *Maptitude* are created from the U.S. Census 1990-2010 TIGER (Topologically Integrated Geographic Encoding and Referencing) files.

4. I used population data from the 1990-2020 PL 94-171 data files published by the U.S. Census Bureau. The PL 94-171 dataset is published in electronic format and is the complete count population file designed by the Census Bureau for use in legislative redistricting. The file contains basic race and ethnicity data on the total population and voting-age population found in units of Census geography such as states, counties, municipalities, townships, reservations, school districts, census tracts, census block groups, precincts (called voting districts or “VTDs” by the Census Bureau) and census blocks.

5. I obtained 2020 block-level disaggregated citizenship (2015-19 ACS data from the Redistricting Data Hub.

6. The attorneys for the plaintiffs provided me with incumbent addresses from the Redistricting Data Hub.

7. For my analysis, I also relied on shapefiles for current and historical legislative plans available on the website of the Legislative and Congressional Reapportionment Office.

8. I developed the illustrative plans presented in this report using *Maptitude for Redistricting*. The *Maptitude for Redistricting* software processes the TIGER files to produce a map for display on a computer screen. The software also merges demographic data from the PL 94-171 files to match the relevant decennial Census geography.

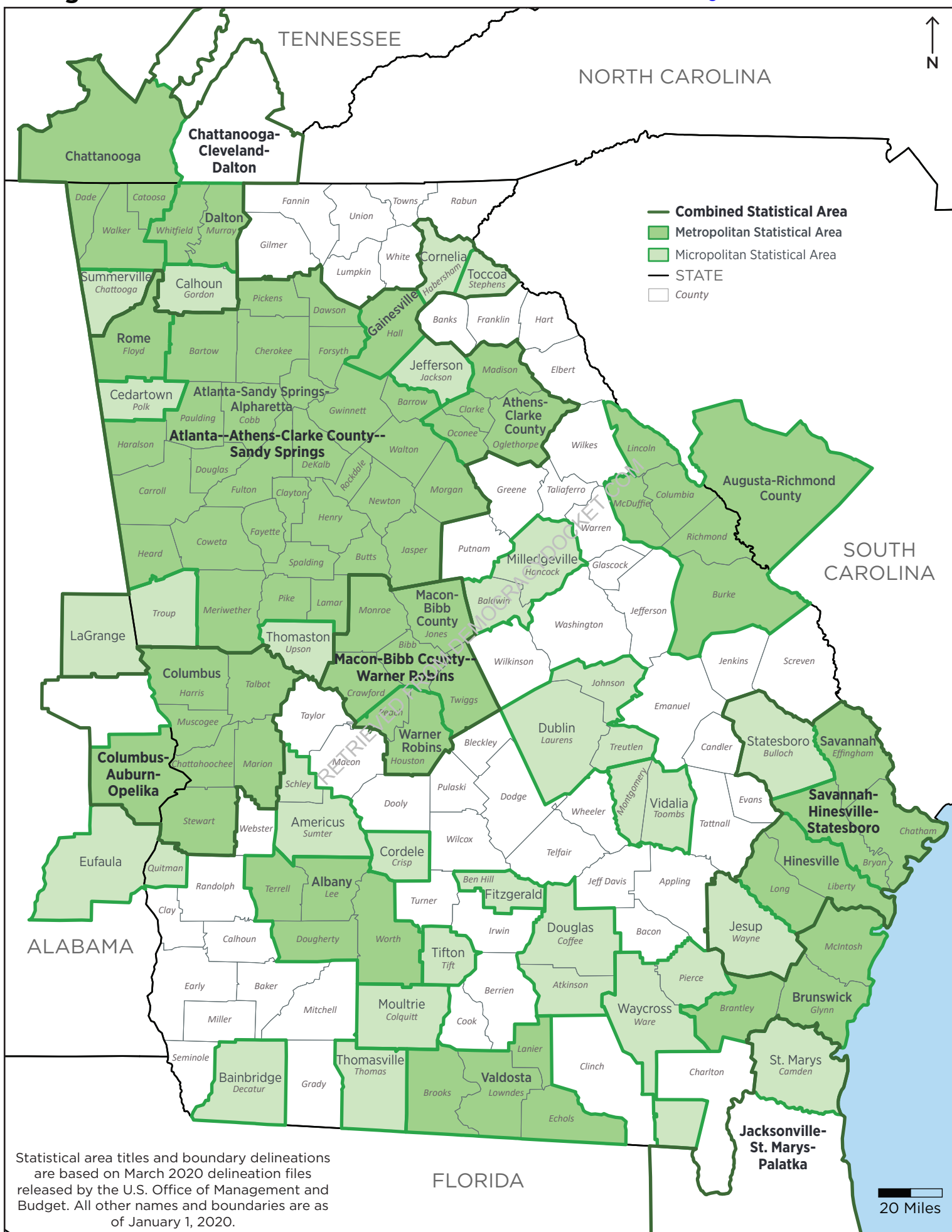
9. I also reviewed and used data from the American Community Survey (“ACS”) conducted by the Census Bureau – specifically, the 1-year 2019 ACS, the 5-year 2015-2019 ACS, and the 5-year 2015-2019 ACS Special Tabulation of citizen population and voting age population by race and ethnicity (prepared by the Census Bureau for the U.S. Department of Justice) and available from the link below:

<https://www.census.gov/programs-surveys/decennial-census/about/voting-rights/cvap.html>

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# EXHIBIT C

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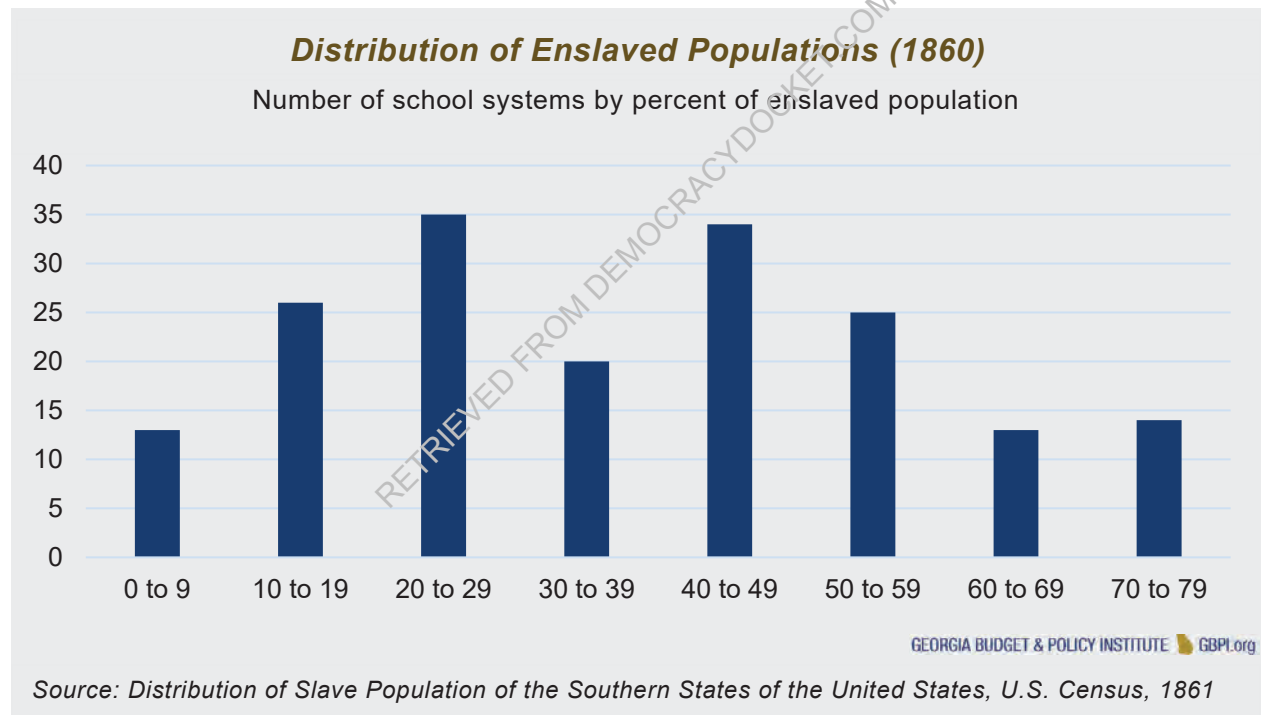
# EXHIBIT D

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## Appendix A: Sample Selection

This analysis relied on three measures to select the Black Belt school systems: historical data of enslaved labor, current enrollments of Black students and current enrollments of students living in poverty. School systems were considered if they had one of the following criteria: a majority-Black student population, majority of students living in poverty and a history of enslaved labor. Enslaved labor data is based on the 1860 U.S. Census data of the distribution of enslaved populations. A review of the data showed a normal distribution of enslaved people as a portion of the population except for a dip in the number of counties with 30 to 39 percent enslaved. The following chart displays the drop in enslaved populations and the subsequent increase in the number of counties that held 40 to 49 percent enslaved people.



This sharp increase of counties and cities that contained more than 40 percent of their population enslaved made for a natural threshold for this analysis. This analysis considered all school systems that currently operate in an area that previously had enslaved people greater than 40 percent of the population as having a history of slavery.

School systems that met two of the criteria were included in the selection. Of the remaining systems, the current enrollment had to exceed 30 percent Black and 30



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percent living in poverty. This threshold made it possible that even if the school system were not majority Black, Black students might represent a plurality of the student body. Metro Atlanta school systems were excluded due to the unique challenges and opportunities that come with educating in the region. A table with the data is below, with Black Belt districts highlighted.

System Name	Slave Population (1860)	Percent Black (2018)	Percent in Poverty (2018)
Appling County	18%	23%	44%
Atkinson County	23%	16%	43%
Atlanta Public Schools	17%	74%	52%
Bacon County	18%	22%	43%
<b>Baker County</b>	<b>70%</b>	<b>64%</b>	<b>68%</b>
<b>Baldwin County</b>	<b>55%</b>	<b>66%</b>	<b>53%</b>
Banks County	23%	2%	28%
Barrow County	32%	13%	25%
Bartow County	27%	10%	26%
Ben Hill County	15%	42%	48%
Berrien County	13%	12%	40%
<b>Bibb County</b>	<b>42%</b>	<b>73%</b>	<b>55%</b>
Bleckley County	47%	26%	37%
Brantley County	20%	3%	40%
Bremen City	8%	6%	13%
<b>Brooks County</b>	<b>52%</b>	<b>53%</b>	<b>54%</b>
Bryan County	59%	16%	14%
Buford City	20%	11%	15%
Bulloch County	38%	37%	39%
<b>Burke County</b>	<b>71%</b>	<b>65%</b>	<b>52%</b>
<b>Butts County</b>	<b>48%</b>	<b>32%</b>	<b>41%</b>
Calhoun City	21%	6%	23%
<b>Calhoun County</b>	<b>56%</b>	<b>93%</b>	<b>74%</b>
Camden County	77%	22%	27%
Candler County	27%	29%	46%
Carroll County	16%	17%	29%
Carrollton City	16%	33%	29%
Cartersville City	27%	23%	24%
Catoosa County	14%	3%	23%
Charlton County	31%	29%	38%



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System Name	Slave Population (1860)	Percent Black (2018)	Percent in Poverty (2018)
<b>Chatham County</b>	49%	57%	40%
Chattahoochee County	48%	27%	32%
Chattooga County	29%	9%	44%
Cherokee County	11%	8%	10%
Chickamauga City	15%	0%	11%
<b>Clarke County</b>	51%	49%	46%
<b>Clay County</b>	46%	95%	74%
Clayton County	28%	70%	42%
Clinch County	15%	34%	46%
Cobb County	27%	31%	15%
Coffee County	23%	31%	45%
Colquitt County	8%	27%	49%
Columbia County	70%	20%	15%
Commerce City	32%	11%	27%
Cook County	13%	33%	46%
Coweta County	49%	23%	20%
Crawford County	56%	22%	40%
<b>Crisp County</b>	45%	58%	50%
Dade County	10%	1%	22%
Dalton City	17%	5%	18%
Dawson County	9%	1%	22%
Decatur City	26%	21%	9%
<b>Decatur County</b>	50%	50%	49%
DeKalb County	26%	62%	41%
<b>Dodge County</b>	47%	35%	45%
<b>Dooly County</b>	46%	72%	52%
<b>Dougherty County</b>	73%	89%	64%
Douglas County	24%	53%	28%
<b>Dublin City</b>	47%	91%	72%
<b>Early County</b>	66%	70%	59%
Echols County	21%	2%	52%
Effingham County	46%	15%	20%
<b>Elbert County</b>	55%	34%	42%
<b>Emanuel County</b>	26%	42%	53%
<b>Evans County</b>	27%	35%	54%



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System Name	Slave Population (1860)	Percent Black (2018)	Percent in Poverty (2018)
Fannin County	3%	0%	31%
Fayette County	29%	28%	11%
Floyd County	39%	7%	28%
Forsyth County	12%	4%	6%
Franklin County	18%	10%	36%
Fulton County	17%	42%	23%
Gainesville City	14%	18%	35%
Gilmer County	3%	0%	26%
Glascock County	31%	8%	29%
<b>Glynn County</b>	<b>73%</b>	<b>35%</b>	<b>38%</b>
Gordon County	21%	2%	28%
<b>Grady County</b>	<b>58%</b>	<b>34%</b>	<b>46%</b>
<b>Greene County</b>	<b>67%</b>	<b>47%</b>	<b>41%</b>
Gwinnett County	20%	32%	20%
Habersham County	13%	2%	29%
Hall County	14%	5%	23%
<b>Hancock County</b>	<b>68%</b>	<b>96%</b>	<b>63%</b>
Haralson County	8%	2%	40%
Harris County	56%	16%	16%
Hart County	25%	23%	36%
Heard County	36%	9%	36%
Henry County	42%	53%	25%
Houston County	69%	38%	30%
Irwin County	15%	32%	42%
Jackson County	32%	6%	25%
Jasper County	65%	23%	41%
Jeff Davis County	23%	15%	43%
Jefferson City	32%	8%	13%
<b>Jefferson County</b>	<b>59%</b>	<b>68%</b>	<b>56%</b>
<b>Jenkins County</b>	<b>71%</b>	<b>52%</b>	<b>55%</b>
<b>Johnson County</b>	<b>29%</b>	<b>42%</b>	<b>50%</b>
Jones County	66%	25%	29%
Lamar County	47%	32%	37%
Lanier County	30%	25%	43%
Laurens County	47%	29%	39%



## POLICY REPORT

System Name	Slave Population (1860)	Percent Black (2018)	Percent in Poverty (2018)
Lee County	52%	21%	28%
<b>Liberty County</b>	73%	53%	36%
<b>Lincoln County</b>	69%	38%	40%
Long County	74%	26%	38%
Lowndes County	46%	22%	28%
Lumpkin County	9%	1%	28%
<b>Macon County</b>	58%	81%	53%
Madison County	34%	9%	33%
Marietta City	27%	39%	23%
<b>Marion County</b>	48%	34%	42%
<b>McDuffie County</b>	70%	55%	52%
<b>McIntosh County</b>	74%	42%	44%
<b>Meriwether County</b>	57%	58%	45%
Miller County	36%	38%	46%
<b>Mitchell County</b>	37%	59%	54%
Monroe County	64%	24%	38%
<b>Montgomery County</b>	33%	32%	56%
Morgan County	70%	26%	30%
Murray County	20%	0%	29%
<b>Muscogee County</b>	45%	58%	40%
<b>Newton County</b>	45%	56%	40%
Oconee County	51%	4%	9%
Oglethorpe County	65%	17%	33%
Paulding County	8%	24%	19%
<b>Peach County</b>	56%	51%	46%
<b>Pelham City</b>	37%	56%	55%
Pickens County	5%	1%	24%
Pierce County	12%	9%	33%
Pike County	47%	8%	21%
Polk County	39%	14%	42%
<b>Pulaski County</b>	47%	40%	50%
<b>Putnam County</b>	71%	37%	47%
<b>Quitman County</b>	47%	72%	57%
Rabun County	6%	1%	33%
<b>Randolph County</b>	47%	96%	66%





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System Name	Slave Population (1860)	Percent Black (2018)	Percent in Poverty (2018)
<b>Richmond County</b>	40%	74%	52%
Rockdale County	45%	67%	39%
Rome City	39%	35%	38%
Schley County	51%	16%	26%
<b>Screven County</b>	55%	47%	47%
<b>Seminole County</b>	50%	41%	50%
Social Circle City	42%	22%	29%
<b>Spalding County</b>	44%	47%	45%
Stephens County	13%	13%	40%
<b>Stewart County</b>	59%	95%	61%
<b>Sumter County</b>	52%	72%	57%
<b>Talbot County</b>	63%	91%	53%
<b>Taliaferro County</b>	63%	77%	61%
Tattnall County	27%	25%	46%
<b>Taylor County</b>	40%	41%	42%
<b>Telfair County</b>	31%	41%	52%
<b>Terrell County</b>	46%	93%	74%
<b>Thomas County</b>	58%	35%	41%
<b>Thomaston-Upson County</b>	49%	35%	42%
<b>Thomasville City</b>	58%	57%	41%
Tift County	23%	35%	44%
Toombs County	27%	18%	54%
Towns County	4%	1%	29%
Treutlen County	33%	40%	47%
Trion City	29%	1%	15%
<b>Troup County</b>	62%	43%	36%
<b>Turner County</b>	23%	63%	57%
<b>Twiggs County</b>	65%	62%	55%
Union County	3%	0%	24%
<b>Valdosta City</b>	46%	75%	59%
<b>Vidalia City</b>	27%	50%	43%
Walker County	15%	6%	30%
Walton County	42%	23%	27%
Ware County	17%	36%	48%
<b>Warren County</b>	55%	91%	67%



System Name	Slave Population (1860)	Percent Black (2018)	Percent in Poverty (2018)
<b>Washington County</b>	52%	64%	50%
Wayne County	28%	22%	41%
<b>Webster County</b>	46%	44%	45%
<b>Wheeler County</b>	33%	36%	49%
White County	8%	2%	30%
Whitfield County	17%	1%	20%
Wilcox County	20%	34%	44%
<b>Wilkes County</b>	70%	51%	49%
<b>Wilkinson County</b>	42%	55%	52%
Worth County	23%	34%	46%

Source: Institute of Taxation and Economic Policy, February 2019; "Who Pays? A Distributional Analysis of the Tax Systems in All 50 States," Institute on Taxation and Economic Policy, October 2018

## Appendix B: Methods

This analysis focuses on K-12 public education funding and outcomes as a measure of the state's responsibility to its citizens. Schools operate in a complex environment of federal and state laws and local district decisions. The state constitution outlines the ultimate responsibility for public education, however.

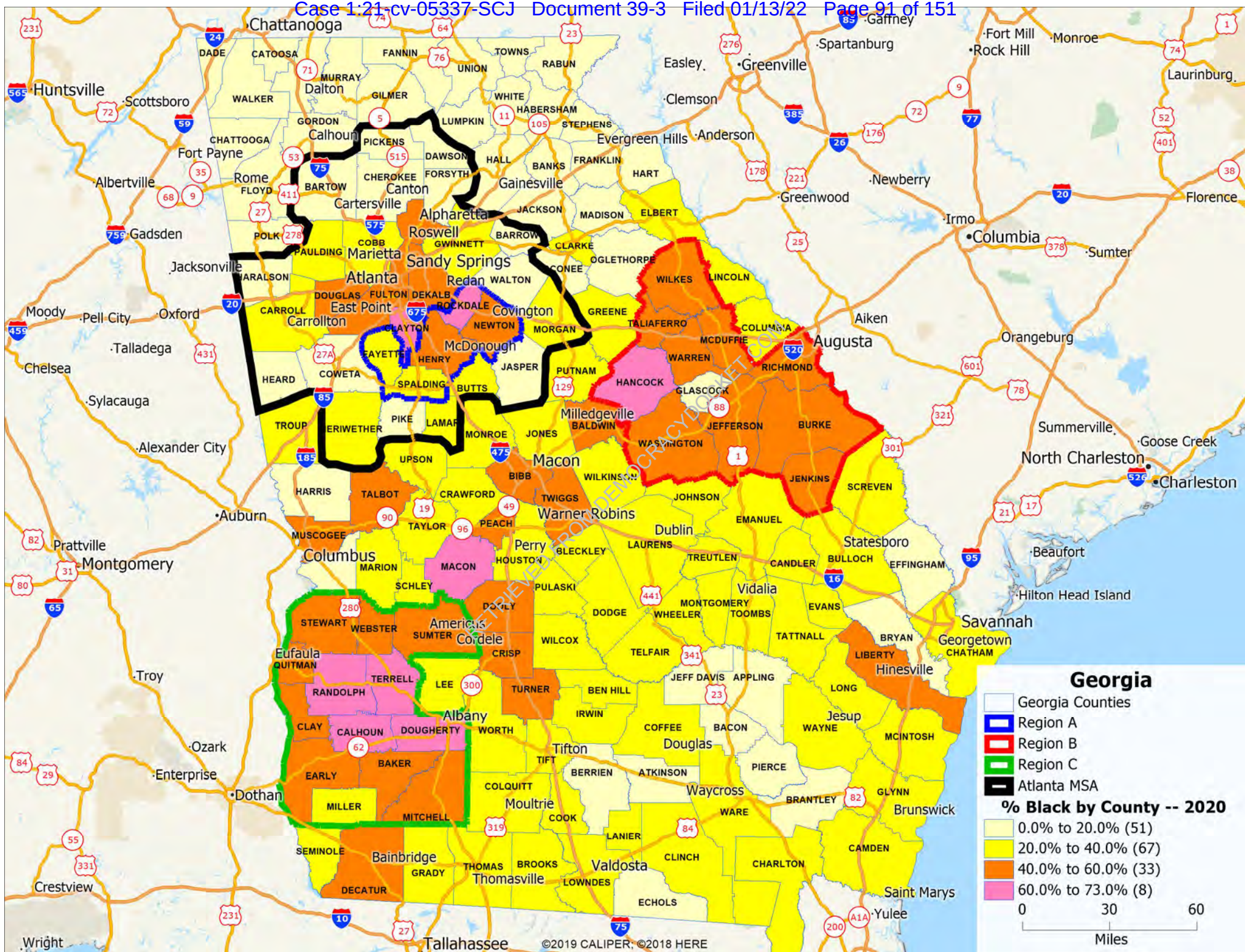
For decades school finance experts studied state funding systems by comparing inputs, or investments, meaning that two similar students, regardless of the location of their schools, should be provided similar funding amounts.<sup>47</sup> Additionally, if there were notable differences between students that affected the school program each would require, then different funding amounts might also be required. It is for this very reason that students with disabilities are provided more funding than students without disabilities.<sup>48</sup> This focus on inputs led to the *McDaniel* case mentioned in the report's timeline. The *McDaniel* case was a primary driver for state policymakers to draft and pass the Quality Basic Education Act, an overhaul to the state's education funding formula, in 1985.<sup>49</sup>

More recently, education finance has been analyzed through outputs, or outcomes. Instead of solely judging a funding system by the amount of money provided, states have been held accountable for the level of student performance.<sup>50</sup> The question no longer stops at whether funding amounts are equal, but whether they are adequate to produce high levels of learning for students across the state. This analysis considers various inputs such as staffing, budgets and educational opportunities, but the focus remains on outputs.

# EXHIBIT E

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# EXHIBIT F

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# Regional Commissions

# State of Georgia





# EXHIBIT G-1

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County (Metro Atlanta in Bold)									2010 -2020 Change					MSAs
	2020 Pop	AP Black	Latino	NH White	18+ Pop	18+ AP Bl	18+ Latino	NH18+ White	Pop Change	Black Pop Change	18+ Pop Change	Black 18+Pop change	% Black 18+Pop change	
APPLING	18444	3647	1825	12674	13958	2540	1118	10048	208	164	416	121	5.00%	
ATKINSON	8286	1284	2048	4801	6129	937	1282	3787	-89	-216	184	-103	-9.90%	Douglas,
BACON	11140	1970	875	8103	8310	1245	547	6374	44	182	40	31	2.55%	
<b>BAKER</b>	<b>2876</b>	<b>1178</b>	<b>143</b>	<b>1514</b>	<b>2275</b>	<b>932</b>	<b>77</b>	<b>1235</b>	<b>-575</b>	<b>-459</b>	<b>-375</b>	<b>-291</b>	<b>-23.79%</b>	
BALDWIN	43799	18985	1139	22432	35732	14515	835	19377	-1921	-300	-637	488	3.48%	Milledgeville,
BANKS	18035	589	1164	15578	13900	365	721	12278	-360	103	148	14	3.99%	
<b>BARROW</b>	<b>83505</b>	<b>11907</b>	<b>10560</b>	<b>55582</b>	<b>62195</b>	<b>8222</b>	<b>6726</b>	<b>43241</b>	<b>14138</b>	<b>3287</b>	<b>12417</b>	<b>2553</b>	<b>45.03%</b>	<b>Atlanta-Sandy Spring</b>
<b>BARTOW</b>	<b>108901</b>	<b>13395</b>	<b>10751</b>	<b>80159</b>	<b>83570</b>	<b>9377</b>	<b>6817</b>	<b>63759</b>	<b>8744</b>	<b>2365</b>	<b>10213</b>	<b>2083</b>	<b>28.56%</b>	<b>Atlanta-Sandy Spring</b>
BEN HILL	17194	6537	1054	9219	13165	4745	653	7459	-440	320	199	498	11.73%	Fitzgerald,
BERRIEN	18160	2198	1045	14396	13690	1499	622	11181	-1126	53	-657	66	4.61%	
BIBB	157346	88865	6737	56787	120902	64270	4734	47979	1799	6394	5474	7743	13.70%	Macon-Bibb County,
BLECKLEY	12583	2951	469	8867	9613	2036	311	7032	-480	-682	-501	-672	-24.82%	
BRANTLEY	18021	733	326	16317	13692	470	212	12522	-390	130	174	67	16.63%	Brunswick,
BROOKS	16301	5958	955	9066	12747	4357	635	7483	58	164	354	212	5.11%	Valdosta,
BRYAN	44738	7463	3269	31321	31828	5025	1919	23033	14505	2837	10452	2048	68.79%	Savannah,
BULLOCH	81099	24375	4180	49712	64494	18220	3021	41041	10882	4369	8670	3305	22.16%	Statesboro,
<b>BURKE</b>	<b>24596</b>	<b>11430</b>	<b>777</b>	<b>11941</b>	<b>18778</b>	<b>8362</b>	<b>494</b>	<b>9566</b>	<b>1280</b>	<b>-282</b>	<b>2047</b>	<b>501</b>	<b>6.37%</b>	<b>Augusta-Richmond C</b>
<b>BUTTS</b>	<b>25434</b>	<b>7212</b>	<b>803</b>	<b>16628</b>	<b>20360</b>	<b>5660</b>	<b>559</b>	<b>13510</b>	<b>1779</b>	<b>595</b>	<b>2030</b>	<b>564</b>	<b>11.07%</b>	<b>Atlanta-Sandy Spring</b>
<b>CALHOUN</b>	<b>5573</b>	<b>3629</b>	<b>149</b>	<b>1766</b>	<b>4687</b>	<b>2398</b>	<b>90</b>	<b>1567</b>	<b>-1121</b>	<b>-520</b>	<b>-687</b>	<b>-264</b>	<b>-8.09%</b>	
CAMDEN	54768	11072	3658	37203	41808	7828	2457	29410	4255	508	4947	818	11.67%	St. Marys,
CANDLER	10981	2807	1378	6567	8241	2009	835	5229	-17	76	62	59	3.03%	
<b>CARROLL</b>	<b>119148</b>	<b>24618</b>	<b>9586</b>	<b>80725</b>	<b>90996</b>	<b>17827</b>	<b>6129</b>	<b>63803</b>	<b>8621</b>	<b>3049</b>	<b>8593</b>	<b>2916</b>	<b>19.56%</b>	<b>Atlanta-Sandy Spring</b>
CATOOSA	67872	2642	2341	59280	52448	1684	1492	46578	3930	849	4446	642	61.61%	Chattanooga, TN-
CHARLTON	12518	2798	2036	7532	10135	2147	1971	5929	347	-764	606	-654	-23.35%	
CHATHAM	295291	115458	23790	139433	234715	85178	16551	119161	30163	6030	29594	7835	10.13%	Savannah,
CHATTAHOOCHEE	9565	1825	1610	5403	7199	1287	1160	4212	-1702	-483	-1015	-284	-18.08%	Columbus, -AL
CHATTOOGA	24965	2865	1297	20079	19416	2235	733	15885	-1050	-226	-741	-306	-12.04%	Summerville,
<b>CHEROKEE</b>	<b>266620</b>	<b>21687</b>	<b>32111</b>	<b>197867</b>	<b>202928</b>	<b>14976</b>	<b>20915</b>	<b>156155</b>	<b>52274</b>	<b>7817</b>	<b>47502</b>	<b>6222</b>	<b>71.08%</b>	<b>Atlanta-Sandy Spring</b>
CLARKE	128671	33672	14336	72201	106830	24776	10213	64531	11957	1589	10539	1713	7.43%	Athens-Clarke Count
<b>CLAY</b>	<b>2848</b>	<b>1634</b>	<b>41</b>	<b>1143</b>	<b>2246</b>	<b>1231</b>	<b>19</b>	<b>973</b>	<b>-335</b>	<b>-311</b>	<b>-220</b>	<b>-153</b>	<b>-11.05%</b>	
<b>CLAYTON</b>	<b>297595</b>	<b>216351</b>	<b>42546</b>	<b>25902</b>	<b>220578</b>	<b>158854</b>	<b>27378</b>	<b>23396</b>	<b>38171</b>	<b>40374</b>	<b>36133</b>	<b>37475</b>	<b>30.87%</b>	<b>Atlanta-Sandy Spring</b>
CLINCH	6749	2096	253	4256	5034	1406	156	3372	-49	157	79	151	12.03%	
<b>COBB</b>	<b>766149</b>	<b>223116</b>	<b>111240</b>	<b>369182</b>	<b>591848</b>	<b>166141</b>	<b>74505</b>	<b>303300</b>	<b>78071</b>	<b>42151</b>	<b>80257</b>	<b>41430</b>	<b>33.22%</b>	<b>Atlanta-Sandy Spring</b>

County (Metro Atlanta in Bold)	2020 Pop	AP Black	Latino	NH White	18+ Pop	18+ AP Blk	18+ Latino	NH18+ White	2010 -2020 Change					MSAs
									Pop Change	Black Pop Change	18+ Pop Change	Black 18+Pop change	% Black 18+Pop change	
COFFEE	43092	12575	5430	24158	32419	9191	3324	19146	736	981	1164	972	11.83%	Douglas,
COLQUITT	45898	10648	8709	25588	34193	7461	5467	20507	400	181	1279	440	6.27%	Moultrie,
COLUMBIA	156010	32516	11858	99111	114823	22273	7355	76070	31957	12635	24580	9062	68.59%	Augusta-Richmond C
COOK	17229	5014	1134	10658	12938	3595	704	8310	17	221	408	325	9.94%	
<b>COWETA</b>	146158	28289	11053	99421	111155	20196	7384	78073	18841	5130	18670	4501	28.68%	Atlanta-Sandy Spring
CRAWFORD	12130	2455	415	8866	9606	1938	287	7079	-500	-448	-156	-241	-11.06%	Macon-Bibb County,
CRISP	20128	9194	634	9892	15570	6603	414	8248	-3311	-1036	-1747	-214	-3.14%	Cordele,
DADE	16251	228	364	14786	12987	140	243	11925	-382	40	-60	4	2.94%	Chattanooga, TN-
<b>DAWSON</b>	26798	392	1605	23544	21441	249	1047	19183	4468	203	4194	146	141.75%	Atlanta-Sandy Spring
DECATUR	29367	12583	1911	14280	22443	9189	1196	11586	1525	984	1683	1112	13.77%	Bainbridge,
<b>DEKALB</b>	764382	407451	81471	215895	595276	314230	55506	180161	72489	22898	68519	34330	12.27%	Atlanta-Sandy Spring
DODGE	19925	6148	620	12865	15709	4725	406	10360	-1871	-480	-1010	-94	-1.95%	
DOOLY	11208	5652	797	4611	9187	4526	493	4029	-3710	-1859	-2572	-1168	-20.51%	
<b>DOUGHERTY</b>	85790	61457	2413	20631	66266	45631	1591	17909	-8775	-2790	-3965	648	1.44%	Albany,
<b>DOUGLAS</b>	144237	74260	16035	49877	108428	53377	10212	41416	11834	20007	13558	17860	50.29%	Atlanta-Sandy Spring
<b>EARLY</b>	10854	5688	186	4813	8315	4075	113	3985	-154	178	208	284	7.49%	
ECHOLS	3697	193	1091	2328	2709	121	667	1856	-337	10	-142	-18	-12.95%	Valdosta,
EFFINGHAM	64769	10035	3492	48204	47295	6831	2054	36237	12519	2578	9951	1888	38.20%	Savannah,
ELBERT	19637	5520	996	12610	15493	4122	660	10322	-529	-537	26	-210	-4.85%	
EMANUEL	22768	7556	993	13815	17320	5404	589	11013	170	-112	470	135	2.56%	
EVANS	10774	3273	1237	6038	8127	2410	731	4826	-226	19	-36	90	3.88%	
FANNIN	25319	199	753	23351	21188	133	505	19721	1637	84	2037	62	87.32%	
<b>FAYETTE</b>	119194	32076	9480	68144	91798	23728	6168	55102	12627	9578	13330	8373	54.53%	Atlanta-Sandy Spring
FLOYD	98584	15606	11466	67747	76295	11064	7167	55088	2267	1175	3423	1136	11.44%	Rome,
<b>FORSYTH</b>	251283	13222	25226	159407	181193	8751	16204	122017	75772	7917	59087	5460	165.91%	Atlanta-Sandy Spring
FRANKLIN	23424	2207	1121	19262	18307	1523	678	15466	1340	170	1179	95	6.65%	
<b>FULTON</b>	1066710	477624	86302	404793	847182	368635	61914	340541	146129	60732	146287	62029	20.23%	Atlanta-Sandy Spring
GILMER	31353	296	3599	26365	25417	161	2158	22187	3061	84	3354	53	49.07%	
<b>GLASCOCK</b>	2884	226	52	2573	2236	167	31	2003	-198	-39	-33	-18	-9.73%	
GLYNN	84499	22098	6336	52987	66468	15620	4116	44302	4873	633	6073	1061	7.29%	Brunswick,
GORDON	57544	2919	8957	43317	43500	1939	5592	34084	2358	527	3189	323	19.99%	Calhoun,
GRADY	26236	7693	3273	14715	19962	5678	1857	11968	1225	363	1378	563	11.01%	
GREENE	18915	6027	1289	11126	15358	4470	826	9675	2921	-178	2661	62	1.41%	

County (Metro Atlanta in Bold)									2010 -2020 Change					MSAs
	2020 Pop	AP Black	Latino	NH White	18+ Pop	18+ AP Black	18+ Latino	NH18+ White	Pop Change	Black Pop Change	Black 18+ Pop Change	Black 18+Pop change	% Black 18+Pop change	
<b>GWINNETT</b>	957062	287687	220460	310583	709484	202762	146659	252041	151741	86155	138870	71745	54.76%	Atlanta-Sandy Springs
HABERSHAM	46031	2165	6880	34694	35878	1675	4115	28299	2990	498	3141	396	30.96%	Cornelia,
HALL	203136	17006	57010	120418	153844	12094	36146	98800	23452	2609	24326	2332	23.89%	inesville,
<b>HANCOCK</b>	8735	6131	63	2413	7487	5108	47	2220	-694	-887	-223	-421	-7.61%	Milledgeville,
<b>HARALSON</b>	29919	1541	497	26825	22854	1106	323	20617	1139	13	1307	44	4.14%	Atlanta-Sandy Springs
HARRIS	34668	5742	1417	25925	26799	4431	908	20298	2644	64	2393	188	4.43%	Columbus, -AL
HART	25828	4732	931	19250	20436	3447	578	15761	615	-167	834	-49	-1.40%	
<b>HEARD</b>	11412	1142	253	9589	8698	832	153	7407	-422	-101	-88	-60	-6.73%	Atlanta-Sandy Springs
<b>HENRY</b>	240712	125211	18437	86297	179973	89657	12030	69744	36790	46914	35708	38225	74.32%	Atlanta-Sandy Springs
HOUSTON	163633	56520	11807	86211	122118	39605	7530	68018	23733	14719	19709	11436	40.60%	Warner Robins,
IRWIN	9666	2333	663	6402	7547	1720	545	5047	128	-182	324	-110	-6.01%	
JACKSON	75907	6148	6712	59064	56451	4268	4261	45015	15422	1618	12011	1140	36.45%	Jefferson,
<b>JASPER</b>	14588	2676	684	10771	11118	1966	402	8400	688	-466	693	-306	-13.47%	Atlanta-Sandy Springs
JEFF DAVIS	14779	2493	2047	9950	10856	1752	1233	7643	-289	191	-46	183	11.66%	
<b>JEFFERSON</b>	15709	8208	462	6834	12301	6324	280	5536	-1221	-1095	-358	-372	-5.56%	
<b>JENKINS</b>	8674	3638	303	4611	7005	2843	194	3874	334	197	901	561	24.58%	
JOHNSON	9189	3124	117	5800	7474	2513	82	4790	-791	-407	-416	-175	-6.51%	Dublin,
JONES	28347	7114	476	20074	21575	5341	302	15428	-322	-55	379	130	2.49%	Macon-Bibb County,
<b>LAMAR</b>	18500	5220	475	12344	14541	4017	323	9852	183	-611	93	-577	-12.56%	Atlanta-Sandy Springs
LANIER	9877	2369	572	6595	7326	1683	370	5010	-201	-133	16	-27	-1.58%	Valdosta,
LAURENS	49570	19132	1424	27881	37734	13695	923	22229	1136	1478	1775	1478	12.10%	Dublin,
LEE	33163	7755	953	22758	24676	5503	603	17356	4865	2324	4313	1733	45.97%	Albany,
LIBERTY	65256	31146	7786	24004	48014	21700	5231	19065	1803	2495	3752	2676	14.07%	Hinesville,
LINCOLN	7690	2212	92	5196	6270	1728	54	4316	-306	-387	-75	-241	-12.24%	Augusta-Richmond C
LONG	16168	4734	1979	8774	11234	3107	1227	6422	1704	827	1189	530	20.57%	Hinesville,
LOWNDES	118251	46758	7872	59306	89031	33302	5201	47140	9018	6468	6768	4906	17.28%	Valdosta,
LUMPKIN	33488	685	1790	29241	27689	507	1345	24419	3522	218	3964	169	50.00%	
MACON	12082	7296	472	4078	9938	6021	322	3379	-2658	-1723	-1549	-910	-13.13%	
MADISON	30120	3196	1956	23549	23112	2225	1198	18643	2000	698	1866	437	24.44%	Athens-Clarke Count
MARION	7498	2223	560	4486	5854	1687	337	3643	-1244	-688	-792	-426	-20.16%	
<b>MCDUFFIE</b>	21632	9045	790	11417	16615	6425	536	9359	-243	167	438	367	6.06%	Augusta-Richmond C
MCINTOSH	10975	3400	231	7060	9040	2641	166	5998	-3358	-1845	-2215	-1292	-32.85%	Brunswick,
<b>MERIWETHER</b>	20613	7547	475	12084	16526	5845	299	9994	-1379	-1204	-256	-393	-6.30%	Atlanta-Sandy Springs

County (Metro Atlanta in Bold)									2010 -2020 Change					MSAs
	2020 Pop	AP Black	Latino	NH White	18+ Pop	18+ AP Bl	18+ Latino	NH18+ White	Pop Change	Black Pop Change	18+ Pop Change	Black 18+Pop change	% Black 18+Pop change	
MILLER	6000	1831	136	3949	4749	1358	92	3239	-125	70	60	112	8.99%	
MITCHELL	21755	10394	964	10106	17065	7917	615	8284	-1743	-935	-597	-257	-3.14%	
MONROE	27957	6444	714	19954	21913	5068	464	15771	1533	57	1442	215	4.43%	Macon-Bibb County,
MONTGOMERY	8610	2224	571	5665	6792	1781	377	4527	-513	-233	-247	-110	-5.82%	Vidalia,
<b>MORGAN</b>	20097	4339	712	14487	15574	3280	434	11452	2229	20	2145	160	5.13%	Atlanta-Sandy Spring
MURRAY	39973	556	5914	32164	30210	321	3696	25146	345	143	1230	101	45.91%	Dalton,
MUSCOGEE	206922	102212	16513	79083	157052	74301	10894	64635	17037	12315	15765	11327	17.99%	Columbus, -AL
<b>NEWTON</b>	112483	55901	7164	46746	84748	40433	4561	37631	12525	13634	13663	12748	46.05%	Atlanta-Sandy Spring
OCONEE	41799	2280	2347	33886	30221	1660	1405	24942	8991	504	6716	409	32.69%	Athens-Clarke Count
OGLETHORPE	14825	2468	869	10903	11639	1853	531	8799	-74	-272	295	-162	-8.04%	Athens-Clarke Count
<b>PAULDING</b>	168661	41296	12564	108444	123998	28164	7974	83066	26337	15231	24768	11767	71.76%	Atlanta-Sandy Spring
PEACH	27981	12645	2547	12119	22111	9720	1788	10071	286	-309	736	-223	-2.24%	Warner Robins,
<b>PICKENS</b>	33216	512	1198	30122	26799	319	755	24626	3785	124	4005	81	34.03%	Atlanta-Sandy Spring
PIERCE	19716	1801	998	16403	14899	1262	595	12662	958	38	1037	50	4.13%	Waycross,
<b>PIKE</b>	18889	1613	348	16313	14337	1254	207	12422	1020	-333	1306	-210	-14.34%	Atlanta-Sandy Spring
POLK	42853	5816	5585	30161	32238	3991	3252	24049	1378	280	1809	274	7.37%	Cedartown,
PULASKI	9855	3250	327	6022	8012	2564	224	5027	-2155	-642	-1420	-387	-13.11%	
PUTNAM	22047	5701	1557	14316	17847	4229	1031	12209	829	64	1230	245	6.15%	
<b>QUITMAN</b>	2235	965	31	1190	1870	765	18	1037	-278	-248	-129	-141	-15.56%	Eufaula, AL-
RABUN	16883	210	1452	14625	13767	129	928	12236	607	-6	920	25	24.04%	
<b>RANDOLPH</b>	6425	3947	143	2250	4977	2913	82	1922	-1294	-862	-1014	-619	-17.53%	
<b>RICHMOND</b>	206607	119970	11449	68397	160899	87930	8445	58403	6058	7979	9655	9329	11.87%	Augusta-Richmond C
<b>ROCKDALE</b>	93570	57204	9540	24500	71503	41935	6089	21457	8355	16468	9202	14643	53.65%	Atlanta-Sandy Spring
SCHLEY	4547	933	175	3357	3328	644	103	2520	-463	-247	-179	-166	-20.49%	Americus,
SCREVEN	14067	5527	287	8018	10893	4144	188	6387	-526	-897	-10	-326	-7.29%	
SEMINOLE	9147	3093	228	5617	7277	2275	160	4681	418	133	552	209	10.12%	
<b>SPALDING</b>	67306	24522	3666	37105	52123	17511	2377	30612	3233	2894	4261	2752	18.65%	Atlanta-Sandy Spring
STEPHENS	26784	3527	857	21323	21163	2467	578	17310	609	387	940	314	14.58%	Toccoa,
<b>STEWART</b>	5314	2538	1217	1338	4617	2048	1196	1161	-744	-360	-492	-156	-7.08%	Columbus, -AL
<b>SUMTER</b>	29616	15546	1770	11528	23036	11479	1147	9800	-3203	-1654	-1482	-395	-3.33%	Americus,
TALBOT	5733	3145	112	2427	4783	2537	56	2129	-1132	-964	-618	-544	-17.66%	Columbus, -AL
<b>TALIAFERRO</b>	1559	876	69	591	1289	722	46	506	-158	-167	-105	-109	-13.12%	
TATTNALL	22842	6331	2303	13825	17654	4886	1419	11020	-2678	-1295	-2460	-1348	-21.62%	

County (Metro Atlanta in Bold)									2010 -2020 Change					MSAs
	2020 Pop	AP Black	Latino	NH White	18+ Pop	18+ AP Bl	18+ Latinc	NH18+ White	Pop Change	Black Pop Change	18+ Pop Change	Black 18+Pop change	% Black 18+Pop change	
TAYLOR	7816	2946	168	4584	6120	2235	107	3686	-1090	-602	-608	-380	-14.53%	
TELFAIR	12477	4754	1928	5970	10190	3806	1757	4802	-4023	-1380	-2994	-924	-19.53%	
TERRELL	9185	5707	177	3189	7204	4274	121	2709	-130	-57	193	241	5.98%	Albany,
THOMAS	45798	16975	1577	25994	35037	12332	970	20740	1078	236	1454	417	3.50%	Thomasville,
TIFT	41344	12734	5219	22189	31224	8963	3295	18011	1226	859	1466	803	9.84%	Tifton,
TOOMBS	27030	7402	3044	16007	20261	5036	1978	12810	-193	453	653	552	12.31%	Vidalia,
TOWNS	12493	168	415	11469	10923	137	338	10100	2022	115	2093	94	218.60%	
TREUTLEN	6406	2114	170	4065	4934	1514	98	3272	-479	-167	-238	-69	-4.36%	Dublin,
TROUP	69426	25473	2956	38099	52581	18202	1822	30377	2382	2501	3339	2433	15.43%	LaGrange, -AL
TURNER	9006	3813	372	4700	6960	2752	256	3891	76	68	233	140	5.36%	
TWIGGS	8022	3226	124	4487	6589	2627	79	3733	-1001	-559	-578	-271	-9.35%	Macon-Bibb County,
UNION	24632	228	816	22646	20808	147	563	19351	3276	112	3245	66	81.48%	
UPSON	27700	8324	633	18009	21711	6202	411	14548	547	572	975	627	11.25%	Thomaston,
WALKER	67654	3664	1685	59654	52794	2454	1066	47292	-1102	368	294	239	10.79%	Chattanooga, TN-
WALTON	96673	18804	5228	68499	73098	13165	3236	53647	12905	5086	11918	4068	44.72%	Atlanta-Sandy Spring
WARE	36251	11421	1612	22275	27788	8226	1012	17818	-61	411	33	377	4.80%	Waycross,
WARREN	5215	3128	53	1974	4159	2360	46	1716	-619	-496	-302	-229	-8.85%	
WASHINGTON	19988	10969	334	8412	15709	8333	235	6944	-1199	-354	-432	47	0.57%	
WAYNE	30144	6390	1732	21301	23105	4662	1116	16754	45	92	467	119	2.62%	Jesup,
WEBSTER	2348	1107	59	1136	1847	844	36	931	-451	-94	-242	-17	-1.97%	
WHEELER	7471	2949	272	4157	6217	2561	174	3418	50	302	195	342	15.41%	
WHITE	28003	721	913	24959	22482	484	605	20318	859	153	1538	104	27.37%	
WHITFIELD	102864	4919	36916	57875	76262	3349	23553	46881	265	400	2946	286	9.34%	Dalton,
WILCOX	8766	3161	272	5185	7218	2693	209	4215	-489	-144	-250	-1	-0.04%	
WILKES	9565	3989	399	4952	7651	3071	243	4154	-1028	-651	-586	-386	-11.17%	
WILKINSON	8877	3330	239	5110	7026	2549	152	4165	-686	-390	-213	-144	-5.35%	
WORTH	20784	5517	381	14427	16444	4108	244	11747	-895	-574	108	-141	-3.32%	Albany,
<b>Total</b>	<b>10711908</b>	<b>3538146</b>	<b>1123457</b>	<b>5362156</b>	<b>8220274</b>	<b>2607986</b>	<b>742918</b>	<b>4342333</b>	<b>1024255</b>	<b>484048</b>	<b>1024173</b>	<b>467197</b>		



# EXHIBIT G-2

RETRIEVED FROM DEMOCRACYDOCKET.COM

County (Metro Atlanta in Bold)	REGIONS	2010 POP.	18_POP	18_AP_B LA	18_HISPA N	NH18__ WHT	2010 % 18 AP Black	2020 Pop	18+ Pop	18+ AP Bl	NH18+ White	2020 % 18 AP Black	Percentage Point Change in 18+ AP Black --2010-2020 MSAs	
APPLING		18236	13542	2419	1016	9968	17.9%	18444	13958	2540	10048	18.2%	0.3%	
ATKINSON		8375	5945	1040	1209	3642	17.5%	8286	6129	937	3787	15.3%	-2.2%	Douglas,
BACON		11096	8270	1214	514	6481	14.7%	11140	8310	1245	6374	15.0%	0.3%	
<b>BAKER</b>	Region C	3451	2650	1223	73	1331	46.2%	2876	2275	932	1235	41.0%	-5.2%	
BALDWIN		45720	36369	14027	677	21005	38.6%	43799	35732	14515	19377	40.6%	2.1%	Milledgeville,
BANKS		18395	13752	351	615	12531	2.6%	18035	13900	365	12278	2.6%	0.1%	
<b>BARROW</b>		69367	49778	5669	3613	38607	11.4%	83505	62195	8222	43241	13.2%	1.8%	Atlanta-Sandy S
<b>BARTOW</b>		100157	73357	7294	4506	60334	9.9%	108901	83570	9377	63759	11.2%	1.3%	Atlanta-Sandy S
BEN HILL		17634	12966	4247	572	7983	32.8%	17194	13165	4745	7459	36.0%	3.3%	Fitzgerald,
BERRIEN		19286	14347	1433	501	12265	10.0%	18160	13690	1499	11181	10.9%	1.0%	
BIBB		155547	115428	56527	2849	53639	49.0%	157346	120902	64270	47979	53.2%	4.2%	Macon-Bibb Cou
BLECKLEY		13063	10114	2708	189	7124	26.8%	12583	9613	2036	7032	21.2%	-5.6%	
BRANTLEY		18411	13518	403	194	12739	3.0%	18021	13692	470	12522	3.4%	0.5%	Brunswick,
BROOKS		16243	12393	4145	553	7564	33.4%	16301	12747	4357	7483	34.2%	0.7%	Valdosta,
BRYAN		30233	21376	2977	777	17090	13.9%	44738	31828	5025	23033	15.8%	1.9%	Savannah,
BULLOCH		70217	55824	14915	1726	37973	26.7%	81099	64494	18220	41041	28.3%	1.5%	Statesboro,
<b>BURKE</b>	Region B	23316	16731	7861	414	8340	47.0%	24596	18778	8362	9566	44.5%	-2.5%	Augusta-Richmo
<b>BUTTS</b>		23655	18330	5096	394	12648	27.8%	25434	20360	5660	13510	27.8%	0.0%	Atlanta-Sandy S
<b>CALHOUN</b>	Region C	6694	5374	3262	194	1893	60.7%	5573	4687	2998	1567	64.0%	3.3%	
CAMDEN		50513	36861	7010	1622	27230	19.0%	54768	41808	7828	29410	18.7%	-0.3%	St. Marys,
CANDLER		10998	8179	1950	774	5392	23.8%	10981	8241	2009	5229	24.4%	0.5%	
<b>CARROLL</b>		110527	82403	14911	4258	62068	18.1%	119148	90996	17827	63803	19.6%	1.5%	Atlanta-Sandy S
CATOOSA		63942	48002	1042	880	45014	2.2%	67872	52448	1684	46578	3.2%	1.0%	Chattanooga, TN-
CHARLTON		12171	9529	2801	252	6343	29.4%	12518	10135	2147	5929	21.2%	-8.2%	
CHATHAM		265128	205121	77343	9986	111471	37.7%	295291	234715	85178	119161	36.3%	-1.4%	Savannah,
CHATTAHOOCHEE		11267	8214	1571	940	5353	19.1%	9565	7199	1287	4212	17.9%	-1.2%	Columbus, -AL
CHATTOOGA		26015	20157	2541	621	16780	12.6%	24965	19416	2235	15885	11.5%	-1.1%	Summerville,
<b>CHEROKEE</b>		214346	155426	8754	12908	129832	5.6%	266620	202928	14976	156155	7.4%	1.7%	Atlanta-Sandy S
CLARKE		116714	96291	23063	7933	60254	24.0%	128671	106830	24776	64531	23.2%	-0.8%	Athens-Clarke Co
<b>CLAY</b>	Region C	3183	2466	1384	16	1045	56.1%	2848	2246	1231	973	54.8%	-1.3%	
<b>CLAYTON</b>		259424	184445	121379	21831	32242	65.8%	297595	220578	158854	23396	72.0%	6.2%	Atlanta-Sandy S
CLINCH		6798	4955	1255	142	3505	25.3%	6749	5034	1406	3372	27.9%	2.6%	
<b>COBB</b>		688078	511591	124711	53080	307377	24.4%	766149	591848	166141	303300	28.1%	3.7%	Atlanta-Sandy S

County (Metro Atlanta in Bold)	REGIONS	2010 POP.	18_POP	18_AP_B LA	18_HISPA N	NH18__ WHT	2010 % 18 AP Black	2020 Pop	18+ Pop	18+ AP Bl	NH18+ White	2020 % 18 AP Black	Percentage Point Change in 18+ AP Black --2010-2020 MSAs	
COFFEE		42356	31255	8219	2554	20113	26.3%	43092	32419	9191	19146	28.4%	2.1%	Douglas,
COLQUITT		45498	32914	7021	4701	20826	21.3%	45898	34193	7461	20507	21.8%	0.5%	Moultrie,
COLUMBIA		124053	90243	13211	3862	68414	14.6%	156010	114823	22273	76070	19.4%	4.8%	Augusta-Richmo
COOK		17212	12530	3270	603	8505	26.1%	17229	12938	3595	8310	27.8%	1.7%	
<b>COWETA</b>		127317	92485	15695	5588	69124	17.0%	146158	111155	20196	78073	18.2%	1.2%	<b>Atlanta-Sandy S</b>
CRAWFORD		12630	9762	2179	196	7266	22.3%	12130	9606	1938	7079	20.2%	-2.1%	Macon-Bibb Cou
CRISP		23439	17317	6817	461	9863	39.4%	20128	15570	6603	8248	42.4%	3.0%	Cordele,
DADE		16633	13047	136	177	12466	1.0%	16251	12987	140	11925	1.1%	0.0%	Chattanooga, TN-
<b>DAWSON</b>		22330	17247	103	602	16265	0.6%	26798	21441	249	19183	1.2%	0.6%	<b>Atlanta-Sandy S</b>
DECATUR		27842	20760	8077	821	11670	38.9%	29367	22443	9189	11586	40.9%	2.0%	Bainbridge,
<b>DEKALB</b>		691893	526757	279900	46921	171336	53.1%	764382	595276	314230	180161	52.8%	-0.3%	<b>Atlanta-Sandy S</b>
DODGE		21796	16719	4819	495	11280	28.8%	19925	15709	4725	10360	30.1%	1.3%	
DOOLY		14918	11759	5694	558	5437	48.4%	11208	9187	4526	4029	49.3%	0.8%	
<b>DOUGHERTY</b>	Region C	94565	70231	44983	1360	23106	64.1%	85790	66266	45631	17909	68.9%	4.8%	Albany,
<b>DOUGLAS</b>		132403	94870	35517	6581	51014	37.4%	144237	108428	53377	41416	49.2%	11.8%	<b>Atlanta-Sandy S</b>
<b>EARLY</b>	Region C	11008	8107	3791	99	4156	46.8%	10854	8315	4075	3985	49.0%	2.2%	
ECHOLS		4034	2851	139	697	1925	4.9%	3697	2709	121	1856	4.5%	-0.4%	Valdosta,
EFFINGHAM		52250	37344	4943	867	30847	13.2%	64769	47295	6831	36237	14.4%	1.2%	Savannah,
ELBERT		20166	15467	4332	588	10422	28.0%	19637	15493	4122	10322	26.6%	-1.4%	
EMANUEL		22598	16850	5269	582	10793	31.3%	22768	17320	5404	11013	31.2%	-0.1%	
EVANS		11000	8163	2320	861	4918	28.4%	10774	8127	2410	4826	29.7%	1.2%	
FANNIN		23682	19151	71	293	18506	0.4%	25319	21188	133	19721	0.6%	0.3%	
<b>FAYETTE</b>	Region A	106567	78468	15355	4183	55492	19.6%	119194	91798	23728	55102	25.8%	6.3%	<b>Atlanta-Sandy S</b>
FLOYD		96317	72872	9928	5376	56175	13.6%	98584	76295	11064	55088	14.5%	0.9%	Rome,
<b>FORSYTH</b>		175511	122106	3291	10403	100172	2.7%	251283	181193	8751	122017	4.8%	2.1%	<b>Atlanta-Sandy S</b>
FRANKLIN		22084	17128	1428	560	14944	8.3%	23424	18307	1523	15466	8.3%	0.0%	
<b>FULTON</b>		920581	700895	306606	48745	304024	43.7%	1066710	847182	368635	340541	43.5%	-0.2%	<b>Atlanta-Sandy S</b>
GILMER		28292	22063	108	1557	20116	0.5%	31353	25417	161	22187	0.6%	0.1%	
<b>GLASCOCK</b>	Region B	3082	2269	185	18	2040	8.2%	2884	2236	167	2003	7.5%	-0.7%	
GLYNN		79626	60395	14559	3283	41521	24.1%	84499	66468	15620	44302	23.5%	-0.6%	Brunswick,
GORDON		55186	40311	1616	4603	33417	4.0%	57544	43500	1939	34084	4.5%	0.4%	Calhoun,
GRADY		25011	18584	5115	1570	11674	27.5%	26236	19962	5678	11968	28.4%	0.9%	
GREENE		15994	12697	4408	573	7609	34.7%	18915	15358	4470	9675	29.1%	-5.6%	

County (Metro Atlanta in Bold)	REGIONS	2010 POP.	18_POP	18_AP_B LA	18_HISPA N	NH18__ WHT	2010 % 18 AP Black		2020 Pop	18+ Pop	18+ AP Bl	NH18+ White	2020 % 18 AP Black	Percentage Point Change in 18+ AP Black --2010-2020		MSAs
<b>GWINNETT</b>		805321	570614	131017	102225	272913	23.0%		957062	709484	202762	252041	28.6%	<b>5.6%</b>		Atlanta-Sandy S
HABERSHAM		43041	32737	1279	2997	27461	3.9%		46031	35878	1675	28299	4.7%	0.8%		Cornelia,
HALL		179684	129518	9762	27227	89587	7.5%		203136	153844	12094	98800	7.9%	0.3%		inesville,
<b>HANCOCK</b>	Region B	9429	7710	5529	118	2018	71.7%		8735	7487	5108	2220	68.2%	-3.5%		Milledgeville,
<b>HARALSON</b>		28780	21547	1062	187	19985	4.9%		29919	22854	1106	20617	4.8%	-0.1%		Atlanta-Sandy S
HARRIS		32024	24406	4243	567	19136	17.4%		34668	26799	4431	20298	16.5%	-0.9%		Columbus, -AL
HART		25213	19602	3496	474	15405	17.8%		25828	20436	3447	15761	16.9%	-1.0%		
<b>HEARD</b>		11834	8786	892	123	7635	10.2%		11412	8698	832	7407	9.6%	-0.6%		Atlanta-Sandy S
<b>HENRY</b>	Region A	203922	144265	51432	7182	80733	35.7%		240712	179973	89657	69744	49.8%	<b>14.2%</b>		Atlanta-Sandy S
HOUSTON		139900	102409	28169	5357	65255	27.5%		163633	122118	39605	68018	32.4%	<b>4.9%</b>		Warner Robins,
IRWIN		9538	7223	1830	140	5209	25.3%		9666	7547	1720	5047	22.8%	-2.5%		
JACKSON		60485	44440	3128	2251	38046	7.0%		75907	56451	4268	45015	7.6%	0.5%		Jefferson,
<b>JASPER</b>		13900	10425	2272	308	7724	21.8%		14588	11118	1966	8400	17.7%	-4.1%		Atlanta-Sandy S
JEFF DAVIS		15068	10902	1569	893	8352	14.4%		14779	10856	1752	7643	16.1%	1.7%		
JEFFERSON	Region B	16930	12659	6696	340	5550	52.9%		15709	12301	6324	5536	51.4%	-1.5%		
JENKINS	Region B	8340	6104	2282	214	3556	37.4%		8674	7005	2843	3874	40.6%	3.2%		
JOHNSON		9980	7890	2688	128	5047	34.1%		9189	7474	2513	4790	33.6%	-0.4%		Dublin,
JONES		28669	21196	5211	188	15538	24.6%		28347	21575	5341	15428	24.8%	0.2%		Macon-Bibb Cou
<b>LAMAR</b>		18317	14448	4594	219	9500	31.8%		18500	14541	4017	9852	27.6%	-4.2%		Atlanta-Sandy S
LANIER		10078	7310	1710	259	5195	23.4%		9877	7326	1683	5010	23.0%	-0.4%		Valdosta,
LAURENS		48434	35959	12217	725	22496	34.0%		49570	37734	13695	22229	36.3%	2.3%		Dublin,
LEE		28298	20363	3770	348	15672	18.5%		33163	24676	5503	17356	22.3%	3.8%		Albany,
LIBERTY		63453	44262	19024	3649	20233	43.0%		65256	48014	21700	19065	45.2%	2.2%		Hinesville,
LINCOLN		7996	6345	1969	63	4250	31.0%		7690	6270	1728	4316	27.6%	-3.5%		Augusta-Richmo
LONG		14464	10045	2577	1031	6249	25.7%		16168	11234	3107	6422	27.7%	2.0%		Hinesville,
LOWNDES		109233	82263	28396	3467	48506	34.5%		118251	89031	33302	47140	37.4%	2.9%		Valdosta,
LUMPKIN		29966	23725	338	861	22026	1.4%		33488	27689	507	24419	1.8%	0.4%		
MACON		14740	11487	6931	346	9690	60.3%		12082	9938	6021	3379	60.6%	<b>0.2%</b>		
MADISON		28120	21246	1788	642	7069	8.4%		30120	23112	2225	18643	9.6%	1.2%		Athens-Clarke C
MARION		8742	6646	2113	353	4035	31.8%		7498	5854	1687	3643	28.8%	-3.0%		Columbus, -AL
<b>MCDUFFIE</b>	Region B	21875	16177	6058	282	18544	37.4%		21632	16615	6425	9359	38.7%	<b>1.2%</b>		Augusta-Richmo
MCINTOSH		14333	11255	3933	147	4057	34.9%		10975	9040	2641	5998	29.2%	-5.7%		Brunswick,
<b>MERIWETHER</b>		21992	16782	6238	216	10121	37.2%		20613	16526	5845	9994	35.4%	-1.8%		Atlanta-Sandy S

													Percentage Point		
													2020 %	Change in	
County (Metro				18_AP_B	18_HISPA	NH18__	2010 % 18				NH18+		18 AP	18+ AP Black	
Atlanta in Bold)	REGIONS	2010 POP.	18_POP	LA	N	WHT	AP Black		2020 Pop	18+ Pop	18+ AP Bl	White	Black	--2010-2020	MSAs
MILLER	Region C	6125	4689	1246	51	3364	26.6%		6000	4749	1358	3239	28.6%	2.0%	
MITCHELL	Region C	23498	17662	8174	675	8626	46.3%		21755	17065	7917	8284	46.4%	0.1%	
MONROE		26424	20471	4853	351	14967	23.7%		27957	21913	5068	15771	23.1%	-0.6%	Macon-Bibb Cou
MONTGOMERY		9123	7039	1891	294	4822	26.9%		8610	6792	1781	4527	26.2%	-0.6%	Vidalia,
MORGAN		17868	13429	3120	304	9845	23.2%		20097	15574	3280	11452	21.1%	-2.2%	Atlanta-Sandy S
MURRAY		39628	28980	220	2875	25580	0.8%		39973	30210	321	25146	1.1%	0.3%	Dalton,
MUSCOGEE		189885	141287	62974	7954	66462	44.6%		206922	157052	74301	64635	47.3%	2.7%	Columbus, -AL
NEWTON	Region A	99958	71085	27685	2719	39806	38.9%		112483	84748	40433	37631	47.7%	8.8%	Atlanta-Sandy S
OCONEE		32808	23505	1251	854	20545	5.3%		41799	30221	1660	24942	5.5%	0.2%	Athens-Clarke Co
OGLETHORPE		14899	11344	2015	318	8876	17.8%		14825	11639	1853	8799	15.9%	-1.8%	Athens-Clarke Co
PAULDING		142324	99230	16397	4235	77000	16.5%		168661	123998	28164	83066	22.7%	6.2%	Atlanta-Sandy S
PEACH		27695	21375	9943	1225	9937	46.5%		27981	22111	9720	10071	44.0%	-2.6%	Warner Robins,
PICKENS		29431	22794	238	488	21759	1.0%		33216	26799	319	24626	1.2%	0.1%	Atlanta-Sandy S
PIERCE		18758	13862	1212	510	11953	8.7%		19716	14899	1262	12662	8.5%	-0.3%	Waycross,
PIKE		17869	13031	1464	130	11275	11.2%		18889	14337	1254	12422	8.7%	-2.5%	Atlanta-Sandy S
POLK		41475	30429	3717	2781	23535	12.2%		42853	32238	3991	24049	12.4%	0.2%	Cedartown,
PULASKI		12010	9432	2951	275	6097	31.3%		9855	8012	2564	5027	32.0%	0.7%	
PUTNAM		21218	16617	3984	825	11647	24.0%		22047	17847	4229	12209	23.7%	-0.3%	
QUITMAN	Region C	2513	1999	906	21	1072	45.3%		2235	1870	765	1037	40.9%	-4.4%	Eufaula, AL-
RABUN		16276	12847	104	819	11728	0.8%		16883	13767	129	12236	0.9%	0.1%	
RANDOLPH	Region C	7719	5991	3532	89	2366	59.0%		6425	4977	2913	1922	58.5%	-0.4%	
RICHMOND	Region B	200549	151244	78601	5630	63232	52.0%		206607	160899	87930	58403	54.6%	2.7%	Augusta-Richmo
ROCKDALE	Region A	85215	62301	27292	5017	28709	43.8%		93570	71503	41935	21457	58.6%	14.8%	Atlanta-Sandy S
SCHLEY		5010	3507	810	82	2579	23.1%		4547	3328	644	2520	19.4%	-3.7%	Americus,
SCREVEN		14593	10903	4470	106	6241	41.0%		14067	10893	4144	6387	38.0%	-3.0%	
SEMINOLE		8729	6725	2066	124	4489	30.7%		9147	7277	2275	4681	31.3%	0.5%	
SPALDING	Region A	64073	47862	14759	1612	30775	30.8%		67306	52123	17511	30612	33.6%	2.8%	Atlanta-Sandy S
STEPHENS		26175	20223	2153	363	17423	10.6%		26784	21163	2467	17310	11.7%	1.0%	Toccoa,
STEWART	Region C	6058	5109	2204	1438	1421	43.1%		5314	4617	2048	1161	44.4%	1.2%	Columbus, -AL
SUMTER	Region C	32819	24518	11874	1098	11129	48.4%		29616	23036	11479	9800	49.8%	1.4%	Americus,
TALBOT		6865	5401	3081	66	2228	57.0%		5733	4783	2537	2129	53.0%	-4.0%	Columbus, -AL
TALIAFERRO	Region B	1717	1394	831	20	533	59.6%		1559	1289	722	506	56.0%	-3.6%	
TATTNALL		25520	20114	6234	1598	12120	31.0%		22842	17654	4886	11020	27.7%	-3.3%	

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County (Metro Atlanta in Bold)	REGIONS	2010 POP.	18_POP	18_AP_B LA	18_HISPA N	NH18__ WHT	2010 % 18 AP Black		2020 Pop	18+ Pop	18+ AP Bl	NH18+ White	2020 % 18 AP Black	Percentage Point Change in 18+ AP Black --2010-2020 MSAs	
TAYLOR		8906	6728	2615	112	3944	38.9%		7816	6120	2235	3686	36.5%	-2.3%	
TELFAIR		16500	13184	4730	1838	6720	35.9%		12477	10190	3806	4802	37.4%	1.5%	
TERRELL	Region C	9315	7011	4033	105	2854	57.5%		9185	7204	4274	2709	59.3%	1.8%	Albany,
THOMAS		44720	33583	11915	793	20401	35.5%		45798	35037	12332	20740	35.2%	-0.3%	Thomasville,
TIFT		40118	29758	8160	2376	18742	27.4%		41344	31224	8963	18011	28.7%	1.3%	Tifton,
TOOMBS		27223	19608	4484	1779	13099	22.9%		27030	20261	5036	12810	24.9%	2.0%	Vidalia,
TOWNS		10471	8830	43	149	8559	0.5%		12493	10923	137	10100	1.3%	0.8%	
TREUTLEN		6885	5172	1583	70	3499	30.6%		6406	4934	1514	3272	30.7%	0.1%	Dublin,
TROUP		67044	49242	15769	1359	31106	32.0%		69426	52581	18202	30377	34.6%	2.6%	LaGrange, -AL
TURNER		8930	6727	2612	175	3879	38.8%		9006	6960	2752	3891	39.5%	0.7%	
TWIGGS		9023	7167	2898	89	4130	40.4%		8022	6589	2627	3733	39.9%	-0.6%	Macon-Bibb Cou
UNION		21356	17563	81	347	16853	0.5%		24632	20808	147	19351	0.7%	0.2%	
UPSON		27153	20736	5575	375	14562	26.9%		27700	21711	6202	14548	28.6%	1.7%	Thomaston,
WALKER		68756	52500	2215	673	48872	4.2%		67654	52794	2454	47292	4.6%	0.4%	Chattanooga, TN-
WALTON		83768	61180	9097	1619	49336	14.9%		96673	73098	13165	53647	18.0%	3.1%	Atlanta-Sandy S
WARE		36312	27755	7849	764	18749	28.3%		36251	27788	8226	17818	29.6%	1.3%	Waycross,
WARREN	Region B	5834	4461	2589	36	1815	58.0%		5215	4159	2360	1716	56.7%	-1.3%	
WASHINGTON	Region B	21187	16141	8286	299	7477	51.3%		19988	15709	8333	6944	53.0%	1.7%	
WAYNE		30099	22638	4543	1181	16655	20.1%		30144	23105	4662	16754	20.2%	0.1%	Jesup,
WEBSTER	Region C	2799	2089	861	49	1173	41.2%		2348	1847	844	931	45.7%	4.5%	
WHEELER		7421	6022	2219	253	3548	36.8%		7471	6217	2561	3418	41.2%	4.3%	
WHITE		27144	20944	380	370	19852	1.8%		28003	22482	484	20318	2.2%	0.3%	
WHITFIELD		102599	73316	3063	18717	50242	4.2%		102864	76262	3349	46881	4.4%	0.2%	Dalton,
WILCOX		9255	7468	2694	261	4470	36.1%		8766	7218	2693	4215	37.3%	1.2%	
WILKES	Region B	10593	8237	3457	218	4505	42.0%		9565	7651	3071	4154	40.1%	-1.8%	
WILKINSON		9563	7239	2693	137	4340	37.2%		8877	7026	2549	4165	36.3%	-0.9%	
WORTH		21679	16336	4249	217	11699	26.0%		20784	16444	4108	11747	25.0%	-1.0%	Albany,
<b>Total</b>		9687653	7196101	2140789	539002	4242514	29.7%		10711908	8220274	2607986	4342333	<b>31.7%</b>	<b>2.0%</b>	



# EXHIBIT G-3

RETRIEVED FROM DEMOCRACYDOCKET.COM

County (Metro Atlanta in Bold)									2000 -2010 Change					MSAs
	2010 Pop	AP Black	Latino	NH White	18+ Pop	18+ AP Bl	18+ Latino	NH18+ White	Pop Change	Black Pop Change	18+ Pop Change	Black 18+Pop change	% Black 18+Pop change	
APPLING	18236	3483	1704	12854	13542	2419	1016	9968	817	33	852	160	7.08%	
ATKINSON	8375	1500	2039	4776	5945	1040	1209	3642	766	-6	644	15	1.46%	Douglas,
BACON	11096	1788	791	8431	8270	1214	514	6481	993	161	815	218	21.89%	
<b>BAKER</b>	<b>3451</b>	<b>1637</b>	<b>145</b>	<b>1642</b>	<b>2650</b>	<b>1223</b>	<b>73</b>	<b>1331</b>	<b>-623</b>	<b>-425</b>	<b>-311</b>	<b>-184</b>	<b>-13.08%</b>	
BALDWIN	45720	19285	919	24704	36369	14027	677	21005	1020	-288	1390	-314	-2.19%	Milledgeville,
BANKS	18395	486	1041	16526	13752	351	615	12531	3973	9	3106	11	3.24%	
<b>BARROW</b>	69367	8620	6037	51736	49778	5669	3613	38607	23223	3945	16759	2554	81.99%	Atlanta-Sandy Sprin
<b>BARTOW</b>	100157	11030	7690	79803	73357	7294	4506	60334	24138	4201	18537	2753	60.63%	Atlanta-Sandy Sprin
BEN HILL	17634	6217	1026	10164	12966	4247	572	7983	150	463	291	505	13.50%	Fitzgerald,
BERRIEN	19286	2145	885	16050	14347	1433	501	12265	3051	263	2536	235	19.62%	
BIBB	155547	82471	4389	65494	115428	56527	2849	53639	1660	9069	2421	7533	15.38%	Macon-Bibb County,
BLECKLEY	13063	3633	301	9000	10114	2708	189	7124	1397	742	1549	830	44.20%	
BRANTLEY	18411	603	343	17198	13518	403	194	12739	3782	-9	3034	7	1.77%	Brunswick,
BROOKS	16243	5794	853	9425	12393	4145	553	7564	-207	-735	368	-122	-2.86%	Valdosta,
BRYAN	30233	4626	1336	23446	21376	2977	777	17090	6816	1195	5248	776	35.26%	Savannah,
BULLOCH	70217	20006	2439	46251	55824	14915	1726	37973	14234	3735	12321	3115	26.40%	Statesboro,
<b>BURKE</b>	<b>23316</b>	<b>11712</b>	<b>617</b>	<b>10844</b>	<b>16731</b>	<b>7861</b>	<b>414</b>	<b>8340</b>	<b>1073</b>	<b>291</b>	<b>1442</b>	<b>634</b>	<b>8.77%</b>	Augusta-Richmond C
<b>BUTTS</b>	<b>23655</b>	<b>6617</b>	<b>597</b>	<b>16200</b>	<b>18330</b>	<b>5096</b>	<b>394</b>	<b>12648</b>	<b>4133</b>	<b>912</b>	<b>3507</b>	<b>902</b>	<b>21.51%</b>	Atlanta-Sandy Sprin
<b>CALHOUN</b>	<b>6694</b>	<b>4149</b>	<b>262</b>	<b>2250</b>	<b>5374</b>	<b>3262</b>	<b>194</b>	<b>1893</b>	<b>374</b>	<b>304</b>	<b>449</b>	<b>354</b>	<b>12.17%</b>	
CAMDEN	50513	10564	2590	35977	36861	7010	1622	27230	6849	1487	7029	1355	23.96%	St. Marys,
CANDLER	10998	2731	1227	6949	8179	1950	774	5392	1421	108	1170	154	8.57%	
<b>CARROLL</b>	110527	21569	6800	80531	82403	14911	4258	62068	23259	6922	17765	4959	49.83%	Atlanta-Sandy Sprin
CATOOSA	63942	1793	1469	59149	48002	1042	880	45014	10660	1026	8476	587	129.01%	Chattanooga, TN-
CHARLTON	12171	3562	310	8116	9529	2801	252	6343	1889	505	2073	644	29.86%	
CHATHAM	265128	109428	14370	133492	205121	77343	9986	111471	33080	14186	31156	13015	20.23%	Savannah,
CHATTAHOOCHEE	11267	2308	1398	7089	8214	1571	940	5353	-3615	-2393	-2442	-1497	-48.79%	Columbus, -AL
CHATTOOGA	26015	3091	1043	21589	20157	2541	621	16780	545	131	521	202	8.64%	Summerville,
<b>CHEROKEE</b>	<b>214346</b>	<b>13870</b>	<b>20566</b>	<b>174243</b>	<b>155426</b>	<b>8754</b>	<b>12908</b>	<b>129832</b>	<b>72443</b>	<b>10019</b>	<b>53633</b>	<b>6272</b>	<b>252.70%</b>	Atlanta-Sandy Sprin
CLARKE	116714	32083	12192	66674	96291	23063	7933	60254	15225	3918	12910	3630	18.68%	Athens-Clarke Count
<b>CLAY</b>	<b>3183</b>	<b>1945</b>	<b>26</b>	<b>1188</b>	<b>2466</b>	<b>1384</b>	<b>16</b>	<b>1045</b>	<b>-174</b>	<b>-99</b>	<b>-27</b>	<b>7</b>	<b>0.51%</b>	
<b>CLAYTON</b>	<b>259424</b>	<b>175977</b>	<b>35447</b>	<b>36610</b>	<b>184445</b>	<b>121379</b>	<b>21831</b>	<b>32242</b>	<b>22907</b>	<b>51427</b>	<b>18849</b>	<b>41548</b>	<b>52.04%</b>	Atlanta-Sandy Sprin
CLINCH	6798	1939	236	4536	4955	1255	142	3505	-80	-118	-7	-100	-7.38%	
<b>COBB</b>	<b>688078</b>	<b>180965</b>	<b>84330</b>	<b>387438</b>	<b>511591</b>	<b>124711</b>	<b>53080</b>	<b>307377</b>	<b>80327</b>	<b>62736</b>	<b>62246</b>	<b>44994</b>	<b>56.44%</b>	Atlanta-Sandy Sprin

County (Metro Atlanta in Bold)									2000 -2010 Change					MSAs
	2010 Pop	AP Black	Latino	NH White	18+ Pop	18+ AP Black	18+ Latino	NH18+ White	Pop Change	Black Pop Change	18+ Pop Change	Black 18+Pop change	% Black 18+Pop change	
COFFEE	42356	11594	4352	25907	31255	8219	2554	20113	4943	1788	4424	1720	26.47%	Douglas,
COLQUITT	45498	10467	7763	26759	32914	7021	4701	20826	3445	478	2404	644	10.10%	Moultrie,
COLUMBIA	124053	19881	6175	91517	90243	13211	3862	68414	34765	9506	27385	6325	91.85%	Augusta-Richmond C
COOK	17212	4793	1024	11171	12530	3270	603	8505	1441	148	1212	345	11.79%	
<b>COWETA</b>	127317	23159	8493	92604	92485	15695	5588	69124	38102	6873	28912	5051	47.45%	Atlanta-Sandy Sprin
CRAWFORD	12630	2903	301	9282	9762	2179	196	7266	135	-116	715	36	1.68%	Macon-Bibb County,
CRISP	23439	10230	748	12216	17317	6817	461	9863	1443	606	1699	827	13.81%	Cordele,
DADE	16633	188	292	15796	13047	136	177	12466	1479	85	1506	50	58.14%	Chattanooga, TN-
<b>DAWSON</b>	22330	189	920	20847	17247	103	602	16265	6331	116	5256	64	164.10%	Atlanta-Sandy Sprin
DECATUR	27842	11599	1404	14615	20760	8077	821	11670	-398	246	582	705	9.56%	Bainbridge,
<b>DEKALB</b>	691893	384553	67824	203395	526757	279900	46921	171336	26028	16037	24870	26315	10.38%	Atlanta-Sandy Sprin
DODGE	21796	6628	732	14273	16719	4819	495	11280	2625	958	2527	997	26.09%	
DOOLY	14918	7511	862	6461	11759	5694	558	5437	3393	1768	3182	1662	41.22%	
<b>DOUGHERTY</b>	94565	64247	2073	27315	70231	44983	1360	23106	-1500	6093	742	6129	15.77%	Albany,
<b>DOUGLAS</b>	132403	54253	11125	64911	94870	35517	6581	51014	40229	36600	28131	23987	208.04%	Atlanta-Sandy Sprin
<b>EARLY</b>	11008	5510	171	5250	8107	3791	99	4156	-1346	-486	-706	-14	-0.37%	
ECHOLS	4034	183	1183	2555	2851	139	697	1925	280	-78	197	-30	-17.75%	Valdosta,
EFFINGHAM	52250	7457	1501	42311	37344	4943	867	30847	14715	2472	11043	1746	54.61%	Savannah,
ELBERT	20166	6057	967	12956	15467	4332	588	10422	-345	-303	258	8	0.19%	
EMANUEL	22598	7668	921	13733	16850	5269	582	10793	761	350	1088	607	13.02%	
EVANS	11000	3254	1441	6228	8163	2320	861	4918	505	-223	552	26	1.13%	
FANNIN	23682	115	431	22761	19151	71	293	18506	3884	83	3497	51	255.00%	
<b>FAYETTE</b>	106567	22498	6760	72202	78468	15355	4183	55492	15304	11666	13759	8269	116.69%	Atlanta-Sandy Sprin
FLOYD	96317	14431	8987	70959	72872	9928	5376	56175	5752	2086	4543	1595	19.14%	Rome,
<b>FORSYTH</b>	175511	5305	16550	140943	122106	3291	10403	100172	77104	4535	51165	2758	517.45%	Atlanta-Sandy Sprin
FRANKLIN	22084	2037	866	18913	17128	1428	560	14944	1799	200	1697	155	12.18%	
<b>FULTON</b>	920581	416892	72566	376014	700895	306606	48745	304024	104575	47878	84179	45410	17.39%	Atlanta-Sandy Sprin
GILMER	28292	212	2677	25078	22063	108	1557	20116	4836	136	4310	65	151.16%	
<b>GLASCOCK</b>	3082	265	33	2750	2269	185	18	2040	526	47	322	22	13.50%	
GLYNN	79626	21465	5126	51602	60395	14559	3283	41521	12058	3318	9935	2637	22.12%	Brunswick,
GORDON	55186	2392	7738	44107	40311	1616	4603	33417	11082	759	7705	512	46.38%	Calhoun,
GRADY	25011	7330	2500	14879	18584	5115	1570	11674	1352	123	1378	407	8.64%	
GREENE	15994	6205	893	8771	12697	4408	573	7609	1588	-229	1905	124	2.89%	

County (Metro Atlanta in Bold)									2000 -2010 Change					MSAs
	2010 Pop	AP Black	Latino	NH White	18+ Pop	18+ AP Black	18+ Latino	NH18+ White	Pop Change	Black Pop Change	Black 18+ Pop Change	Black 18+Pop change	% Black 18+Pop change	
<b>GWINNETT</b>	805321	201532	162035	354316	570614	131017	102225	272913	216873	119728	148159	76424	139.99%	Atlanta-Sandy Springs
HABERSHAM	43041	1667	5333	34621	32737	1279	2997	27461	7139	-41	5266	-99	-7.18%	Cornelia,
HALL	179684	14397	46906	114300	129518	9762	27227	89587	40407	3911	27758	2670	37.65%	inesville,
<b>HANCOCK</b>	9429	7018	139	2212	7710	5529	118	2018	-647	-837	59	-168	-2.95%	Milledgeville,
<b>HARALSON</b>	28780	1528	318	26516	21547	1062	187	19985	3090	85	2555	96	9.94%	Atlanta-Sandy Springs
HARRIS	32024	5678	872	24848	24406	4243	567	19136	8329	1016	6776	899	26.88%	Columbus, -AL
HART	25213	4899	786	19213	19602	3496	474	15405	2216	382	2007	375	12.02%	
<b>HEARD</b>	11834	1243	223	10190	8786	892	123	7635	822	22	938	36	4.21%	Atlanta-Sandy Springs
<b>HENRY</b>	203922	78297	11813	107083	144265	51432	7182	80733	84581	60321	59785	39567	333.48%	Atlanta-Sandy Springs
HOUSTON	139900	41801	8515	84703	102409	28169	5357	65255	29135	13755	22860	9779	53.18%	Warner Robins,
IRWIN	9538	2515	228	6719	7223	1830	140	5209	-393	-70	152	220	13.66%	
JACKSON	60485	4530	3736	50695	44440	3128	2251	38046	18896	1174	13922	705	29.10%	Jefferson,
<b>JASPER</b>	13900	3142	510	10095	10425	2272	308	7724	2474	-3	2108	119	5.53%	Atlanta-Sandy Springs
JEFF DAVIS	15068	2302	1577	11056	10902	1569	893	8352	2384	370	1672	267	20.51%	
JEFFERSON	16930	9303	517	7015	12659	6696	340	5550	-336	-453	296	143	2.18%	
JENKINS	8340	3441	334	4508	6104	2282	214	3556	-235	-55	-28	2	0.09%	
JOHNSON	9980	3531	186	6219	7890	2688	128	5047	1420	363	1909	797	42.15%	Dublin,
JONES	28669	7169	315	20830	21196	5211	188	15538	5030	1600	3968	1159	28.60%	Macon-Bibb County,
<b>LAMAR</b>	18317	5831	341	11943	14448	4594	219	9500	2405	936	2435	1098	31.41%	Atlanta-Sandy Springs
LANIER	10078	2502	461	6899	7310	1710	259	5195	2837	624	2052	422	32.76%	Valdosta,
LAURENS	48434	17654	1143	28920	35959	12217	725	22496	3560	2035	3130	1774	16.99%	Dublin,
LEE	28298	5431	560	21453	20363	3770	348	15672	3541	1542	3195	1048	38.50%	Albany,
LIBERTY	63453	28651	6159	27085	44262	19024	3649	20233	1843	1184	2346	1757	10.18%	Hinesville,
LINCOLN	7996	2599	98	5201	6345	1969	63	4250	-352	-284	34	-92	-4.46%	Augusta-Richmond C
LONG	14464	3907	1778	8491	10045	2577	1031	6249	4160	1331	3152	1017	65.19%	Hinesville,
LOWNDES	109233	40290	5238	61234	82263	28396	3467	48506	17118	8523	14282	6956	32.44%	Valdosta,
LUMPKIN	29966	467	1344	27519	23725	338	861	22026	8950	124	7811	94	38.52%	
MACON	14740	9019	475	12310	11487	6931	282	9690	666	600	1300	1074	18.34%	
MADISON	28120	2498	227	8716	21246	1788	147	7069	2390	282	2280	275	18.18%	Athens-Clarke Count
MARION	8742	2911	527	4961	6646	2113	346	4035	1598	446	1527	477	29.16%	
<b>MCDUFFIE</b>	21875	8878	1139	24106	16177	6058	642	18544	644	833	862	744	14.00%	Augusta-Richmond C
MCINTOSH	14333	5245	570	5100	11255	3933	353	4057	3486	1203	3450	1269	47.64%	Brunswick,
<b>MERIWETHER</b>	21992	8751	347	12606	16782	6238	216	10121	-542	-809	246	-265	-4.08%	Atlanta-Sandy Springs

County (Metro Atlanta in Bold)									2000 -2010 Change					MSAs
	2010 Pop	AP Black	Latino	NH White	18+ Pop	18+ AP Bl	18+ Latino	NH18+ White	Pop Change	Black Pop Change	Black 18+ Pop Change	Black 18+Pop change	% Black 18+Pop change	
MILLER	6125	1761	93	4237	4689	1246	51	3364	-258	-87	-16	58	4.88%	
MITCHELL	23498	11329	1028	10894	17662	8174	675	8626	-434	-195	270	347	4.43%	
MONROE	26424	6387	535	19101	20471	4853	351	14967	4667	260	4427	430	9.72%	Macon-Bibb County,
MONTGOMERY	9123	2457	480	6144	7039	1891	294	4822	853	195	840	222	13.30%	Vidalia,
<b>MORGAN</b>	17868	4319	494	12814	13429	3120	304	9845	2411	-162	2078	6	0.19%	Atlanta-Sandy Sprin
MURRAY	39628	413	5154	33666	28980	220	2875	25580	3122	109	2678	51	30.18%	Dalton,
MUSCOGEE	189885	89897	12110	82890	141287	62974	7954	66462	3594	6740	4998	7142	12.79%	Columbus, -AL
<b>NEWTON</b>	99958	42267	4635	51995	71085	27685	2719	39806	37957	28259	26241	18457	200.01%	Atlanta-Sandy Sprin
OCONEE	32808	1776	1436	28306	23505	1251	854	20545	6583	45	5211	87	7.47%	Athens-Clarke Count
OGLETHORPE	14899	2740	546	11429	11344	2015	318	8876	2264	192	1967	225	12.57%	Athens-Clarke Count
<b>PAULDING</b>	142324	26065	7264	106739	99230	16397	4235	77000	60646	20113	42631	12658	338.54%	Atlanta-Sandy Sprin
PEACH	27695	12954	1890	12499	21375	9943	1225	9937	4027	2138	3870	2057	26.08%	Warner Robins,
<b>PICKENS</b>	29431	388	819	27802	22794	238	488	21759	6448	80	5224	27	12.80%	Atlanta-Sandy Sprin
PIERCE	18758	1763	887	15860	13862	1212	510	11953	3122	17	2395	47	4.03%	Waycross,
<b>PIKE</b>	17869	1946	193	15506	13031	1464	130	11275	4181	-110	3122	-46	-3.05%	Atlanta-Sandy Sprin
POLK	41475	5536	4885	30492	30429	3717	2781	23535	3348	327	2239	194	5.51%	Cedartown,
PULASKI	12010	3892	465	7494	9432	2951	275	6097	2422	579	2060	518	21.29%	
PUTNAM	21218	5637	1347	14024	16617	3984	825	11647	2406	-66	2173	129	3.35%	
<b>QUITMAN</b>	2513	1213	34	1265	1999	906	21	1072	-85	-14	24	91	11.17%	Eufaula, AL-
RABUN	16276	216	1301	14468	12847	104	819	11728	1226	70	1083	26	33.33%	
<b>RANDOLPH</b>	7719	4809	119	2781	5991	3532	89	2366	-72	161	329	385	12.23%	
RICHMOND	200549	111991	8207	76236	151244	78601	5630	63232	774	10663	5077	10870	16.05%	Augusta-Richmond C
<b>ROCKDALE</b>	85215	40736	8063	34826	62301	27292	5017	28709	15104	27644	11478	18911	225.64%	Atlanta-Sandy Sprin
SCHLEY	5010	1180	161	3612	3507	810	82	2579	1244	-14	844	33	4.25%	Americus,
SCREVEN	14593	6424	180	7898	10903	4470	106	6241	-781	-571	-180	-210	-4.49%	
SEMINOLE	8729	2960	204	5516	6725	2066	124	4489	-640	-303	-194	4	0.19%	
<b>SPALDING</b>	64073	21628	2451	38986	47862	14759	1612	30775	5656	3287	5377	2792	23.33%	Atlanta-Sandy Sprin
STEPHENS	26175	3140	633	22006	20223	2153	363	17423	740	-8	755	-12	-0.55%	Toccoa,
<b>STEWART</b>	6058	2898	1454	1655	5109	2204	1438	1421	806	-363	1164	-132	-5.65%	Columbus, -AL
<b>SUMTER</b>	32819	17200	1717	13413	24518	11874	1098	11129	-381	841	550	1118	10.39%	Americus,
TALBOT	6865	4109	91	2639	5401	3081	66	2228	367	72	473	139	4.72%	Columbus, -AL
<b>TALIAFERRO</b>	1717	1043	35	625	1394	831	20	533	-360	-218	-183	-82	-8.98%	
TATTNALL	25520	7626	2502	15196	20114	6234	1598	12120	3215	542	2917	724	13.14%	

County (Metro Atlanta in Bold)									2000 -2010 Change					MSAs
	2010 Pop	AP Black	Latino	NH White	18+ Pop	18+ AP Black	18+ Latino	NH18+ White	Pop Change	Black Pop Change	18+ Pop Change	Black 18+Pop change	% Black 18+Pop change	
TAYLOR	8906	3548	164	5123	6728	2615	112	3944	91	-230	282	66	2.59%	
TELFAIR	16500	6134	2026	8429	13184	4730	1838	6720	4706	1566	4043	1319	38.67%	
TERRELL	9315	5764	157	3366	7011	4033	105	2854	-1655	-929	-845	-361	-8.22%	Albany,
THOMAS	44720	16739	1275	26081	33583	11915	793	20401	1983	-6	2447	673	5.99%	Thomasville,
TIFT	40118	11875	4037	23555	29758	8160	2376	18742	1711	995	1810	1146	16.34%	Tifton,
TOOMBS	27223	6949	3055	16887	19608	4484	1779	13099	1156	591	984	465	11.57%	Vidalia,
TOWNS	10471	53	206	10102	8830	43	149	8559	1152	36	1028	27	168.75%	
TREUTLEN	6885	2281	103	4466	5172	1583	70	3499	31	-2	99	22	1.41%	Dublin,
TROUP	67044	22972	2170	40408	49242	15769	1359	31106	8265	4053	6836	3280	26.26%	LaGrange, -AL
TURNER	8930	3745	282	4820	6727	2612	175	3879	-574	-160	20	156	6.35%	
TWIGGS	9023	3785	124	5059	7167	2898	89	4130	-1567	-863	-564	-306	-9.55%	Macon-Bibb County,
UNION	21356	116	519	20345	17563	81	347	16853	4067	5	3733	-10	-10.99%	
UPSON	27153	7752	588	18522	20736	5575	375	14562	-444	-5	171	192	3.57%	Thomaston,
WALKER	68756	3296	1113	63343	52500	2215	673	48872	7703	838	6563	523	30.91%	Chattanooga, TN-
WALTON	83768	13718	2683	65677	61180	9097	1619	49336	23081	4821	17716	3338	57.96%	Atlanta-Sandy Springs,
WARE	36312	11010	1207	23583	27755	7849	764	18749	829	978	1076	927	13.39%	Waycross,
WARREN	5834	3624	54	2133	4461	2589	36	1815	-502	-159	-205	19	0.74%	
WASHINGTON	21187	11323	407	9339	16141	8286	299	7477	11	-2	669	483	6.19%	
WAYNE	30099	6298	1719	21749	22638	4543	1181	16655	3534	817	2964	679	17.57%	Jesup,
WEBSTER	2799	1201	98	1492	2089	861	49	1173	409	76	302	45	5.51%	
WHEELER	7421	2647	356	4405	6022	2219	253	3548	1242	578	1226	639	40.44%	
WHITE	27144	568	647	25453	20944	380	370	19852	7200	101	5622	36	10.47%	
WHITFIELD	102599	4519	32471	63818	73316	3063	18717	50242	19074	1015	12625	718	30.62%	Dalton,
WILCOX	9255	3305	338	5544	7468	2694	261	4470	678	183	844	358	15.33%	
WILKES	10593	4640	361	5495	8237	3457	218	4505	-94	-2	111	41	1.20%	
WILKINSON	9563	3720	214	5529	7239	2693	137	4340	-657	-477	-198	-146	-5.14%	
WORTH	21679	6091	335	15044	16336	4249	217	11699	-288	-441	653	120	2.91%	Albany,
<b>Total</b>	<b>9687653</b>	<b>3054098</b>	<b>853689</b>	<b>5413920</b>	<b>7196101</b>	<b>2140789</b>	<b>539002</b>	<b>4242514</b>	<b>1501200</b>	<b>660673</b>	<b>1178882</b>	<b>517311</b>	<b>24.16%</b>	



# EXHIBIT G-4

RETRIEVED FROM DEMOCRACYDOCKET.COM

County (Metro Atlanta in Bold)	2000 Pop	AP Black	Latino	NH White	18+ Pop	18+ AP Blk	18+ Latino	NH18+ White	1990 -2000 Change					MSAs
									Pop Change	Black Pop Change	18+ Pop Change	Black 18+Pop change	% Black 18+Pop change	
APPLING	17419	3450	792	13053	12690	2259	513	9826	1675	182	1530	299	15.26%	
ATKINSON	7609	1506	1290	4760	5301	1025	750	3487	1396	-152	950	-23	-2.19%	Douglas,
BACON	10103	1627	342	8068	7455	996	235	6176	537	147	747	163	19.57%	
<b>BAKER</b>	<b>4074</b>	<b>2062</b>	<b>111</b>	<b>1889</b>	<b>2961</b>	<b>1407</b>	<b>64</b>	<b>1482</b>	<b>459</b>	<b>201</b>	<b>426</b>	<b>204</b>	<b>16.96%</b>	
BALDWIN	44700	19573	607	23920	34979	14341	430	19749	5170	2867	4607	2322	19.32%	Milledgeville,
BANKS	14422	477	493	13256	10646	340	309	9856	4114	113	3075	82	31.78%	
<b>BARROW</b>	<b>46144</b>	<b>4675</b>	<b>1460</b>	<b>38543</b>	<b>33019</b>	<b>3115</b>	<b>961</b>	<b>28072</b>	<b>16423</b>	<b>1321</b>	<b>11612</b>	<b>873</b>	<b>38.94%</b>	<b>Atlanta-Sandy Spring</b>
<b>BARTOW</b>	<b>76019</b>	<b>6829</b>	<b>2524</b>	<b>65644</b>	<b>54820</b>	<b>4541</b>	<b>1631</b>	<b>47917</b>	<b>20108</b>	<b>1803</b>	<b>14285</b>	<b>1042</b>	<b>29.78%</b>	<b>Atlanta-Sandy Spring</b>
BEN HILL	17484	5754	800	10818	12675	3742	565	8287	1239	666	1412	663	21.53%	Fitzgerald,
BERRIEN	16235	1882	384	13761	11811	1198	220	10252	2082	234	1567	189	18.73%	
BIBB	153887	73402	2023	76262	113007	48994	1392	60951	3920	10876	2903	7252	17.37%	Macon-Bibb County,
BLECKLEY	11666	2891	107	8505	8565	1878	76	6503	1236	559	884	382	25.53%	
BRANTLEY	14629	612	152	13712	10484	396	96	9879	3552	16	2772	17	4.49%	Brunswick,
BROOKS	16450	6529	505	9303	12025	4267	360	7329	1052	139	1219	345	8.80%	Valdosta,
BRYAN	23417	3431	465	19138	16128	2201	284	13367	7979	1138	5694	755	52.21%	Savannah,
BULLOCH	55983	16271	1052	37998	43503	11800	816	30318	12858	5045	10215	4275	56.81%	Statesboro,
<b>BURKE</b>	<b>22243</b>	<b>11421</b>	<b>316</b>	<b>10336</b>	<b>15289</b>	<b>7227</b>	<b>196</b>	<b>7735</b>	<b>1664</b>	<b>665</b>	<b>1539</b>	<b>675</b>	<b>10.30%</b>	<b>Augusta-Richmond C</b>
<b>BUTTS</b>	<b>19522</b>	<b>5705</b>	<b>277</b>	<b>13366</b>	<b>14823</b>	<b>4194</b>	<b>196</b>	<b>10298</b>	<b>4196</b>	<b>267</b>	<b>3444</b>	<b>308</b>	<b>7.93%</b>	<b>Atlanta-Sandy Spring</b>
<b>CALHOUN</b>	<b>6320</b>	<b>3845</b>	<b>189</b>	<b>2368</b>	<b>4925</b>	<b>2308</b>	<b>155</b>	<b>1939</b>	<b>1307</b>	<b>892</b>	<b>1368</b>	<b>968</b>	<b>49.90%</b>	
CAMDEN	43664	9077	1585	31975	29832	5655	975	22486	13497	2998	8815	1592	39.18%	St. Marys,
CANDLER	9577	2623	882	6028	7009	1796	594	4592	1833	218	1369	233	14.91%	
<b>CARROLL</b>	<b>87268</b>	<b>14647</b>	<b>2243</b>	<b>69258</b>	<b>64638</b>	<b>9952</b>	<b>1625</b>	<b>52256</b>	<b>15846</b>	<b>3416</b>	<b>12357</b>	<b>2350</b>	<b>30.91%</b>	<b>Atlanta-Sandy Spring</b>
CATOOSA	53282	767	621	51013	39526	455	392	38065	10818	410	8085	197	76.36%	Chattanooga, TN-
CHARLTON	10282	3057	81	7014	7456	2157	48	5154	1786	702	1601	675	45.55%	
CHATHAM	232048	95242	5403	125802	173965	64328	3822	101588	15113	12634	14316	9112	16.50%	Savannah,
CHATTAHOOCHEE	14882	4701	1551	8181	10656	3068	1042	6209	-2052	-534	-1548	-502	-14.06%	Columbus, -AL
CHATTOOGA	25470	2960	537	21776	19636	2339	396	16774	3228	1019	3088	1002	74.94%	Summerville,
<b>CHEROKEE</b>	<b>141903</b>	<b>3851</b>	<b>7695</b>	<b>127618</b>	<b>101793</b>	<b>2482</b>	<b>5281</b>	<b>92111</b>	<b>51699</b>	<b>2158</b>	<b>36932</b>	<b>1277</b>	<b>105.98%</b>	<b>Atlanta-Sandy Spring</b>
CLARKE	101489	28165	6436	62895	83381	19433	4529	56121	13895	5230	13339	4138	27.05%	Athens-Clarke Count
<b>CLAY</b>	<b>3357</b>	<b>2044</b>	<b>32</b>	<b>1282</b>	<b>2493</b>	<b>1377</b>	<b>17</b>	<b>1096</b>	<b>-7</b>	<b>0</b>	<b>112</b>	<b>46</b>	<b>3.46%</b>	
<b>CLAYTON</b>	<b>236517</b>	<b>124550</b>	<b>17728</b>	<b>82637</b>	<b>165596</b>	<b>79831</b>	<b>11823</b>	<b>65444</b>	<b>54465</b>	<b>81147</b>	<b>34399</b>	<b>51042</b>	<b>177.30%</b>	<b>Atlanta-Sandy Spring</b>
CLINCH	6878	2057	54	4713	4962	1355	32	3537	718	375	646	317	30.54%	
<b>COBB</b>	<b>607751</b>	<b>118229</b>	<b>46964</b>	<b>417947</b>	<b>449345</b>	<b>79717</b>	<b>32367</b>	<b>319272</b>	<b>160006</b>	<b>74075</b>	<b>114844</b>	<b>48983</b>	<b>159.38%</b>	<b>Atlanta-Sandy Spring</b>

County (Metro Atlanta in Bold)									1990 -2000 Change					MSAs
	2000 Pop	AP Black	Latino	NH White	18+ Pop	18+ AP Bl	18+ Latino	NH18+ White	Pop Change	Black Pop Change	18+ Pop Change	Black 18+Pop change	% Black 18+Pop change	
COFFEE	37413	9806	2550	24701	26831	6499	1609	18475	7821	2302	6093	1820	38.90%	Douglas,
COLQUITT	42053	9989	4554	27252	30510	6377	3037	20906	5408	1128	4242	986	18.29%	Moultrie,
COLUMBIA	89288	10375	2313	72438	62858	6886	1463	51640	23257	3093	16971	1741	33.84%	Augusta-Richmond C
COOK	15771	4645	485	10526	11318	2925	307	7987	2315	614	1723	405	16.07%	
<b>COWETA</b>	89215	16286	2797	68867	63573	10644	2072	49992	35362	4092	25071	2676	33.58%	Atlanta-Sandy Spring
CRAWFORD	12495	3019	301	9037	9047	2143	235	6572	3504	262	2597	239	12.55%	Macon-Bibb County,
CRISP	21996	9624	382	11778	15618	5990	274	9193	1985	1471	1602	1072	21.80%	Cordele,
DADE	15154	103	137	14685	11541	86	90	11198	2007	2	1816	8	10.26%	Chattanooga, TN-
<b>DAWSON</b>	15999	73	254	15429	11991	39	180	11598	6570	69	5177	37	1850.00%	Atlanta-Sandy Spring
DECATUR	28240	11353	905	15800	20178	7372	565	12097	2729	1283	2267	996	15.62%	Bainbridge,
<b>DEKALB</b>	665865	368516	52542	214685	501887	253585	39251	185270	120028	138091	85603	96167	61.09%	Atlanta-Sandy Spring
DODGE	19171	5670	248	13142	14192	3822	162	10126	1564	806	1145	485	14.53%	
DOOLY	11525	5743	537	5161	8577	4032	339	4135	1624	891	1666	1013	33.55%	
<b>DOUGHERTY</b>	96065	58154	1292	35794	69489	38854	874	29091	-246	9767	2495	8532	28.14%	Albany,
<b>DOUGLAS</b>	92174	17653	2640	69965	66739	11530	1679	52179	21054	12056	15768	7868	214.86%	Atlanta-Sandy Spring
<b>EARLY</b>	12354	5996	152	6159	8813	3805	86	4877	500	770	523	591	18.39%	
ECHOLS	3754	261	739	2688	2654	169	501	1936	1420	-3	1017	18	11.92%	Valdosta,
EFFINGHAM	37535	4985	531	31493	26301	3197	324	22422	11848	1365	8589	894	38.82%	Savannah,
ELBERT	20511	6360	489	13505	15209	4324	372	10407	1562	642	1348	531	14.00%	
EMANUEL	21837	7318	745	13663	15762	4662	562	10451	1291	637	1461	683	17.17%	
EVANS	10495	3477	625	6333	7611	2294	435	4837	1771	514	1445	435	23.40%	
FANNIN	19798	32	130	19312	15654	20	88	15314	3806	27	3369	16	400.00%	
<b>FAYETTE</b>	91263	10832	2582	74820	64709	7086	1702	53926	28848	7452	20521	4849	216.76%	Atlanta-Sandy Spring
FLOYD	90565	12345	4983	71674	68329	8333	3288	55597	9314	1239	6547	926	12.50%	Rome,
<b>FORSYTH</b>	98407	770	5477	90820	70941	533	3787	65662	54324	756	38231	519	3707.14%	Atlanta-Sandy Spring
FRANKLIN	20285	1837	187	18064	15431	1273	132	13880	3635	156	2734	156	13.97%	
<b>FULTON</b>	816006	369014	48056	369997	616716	261196	35704	297707	167055	45006	124950	35953	15.96%	Atlanta-Sandy Spring
GILMER	23456	76	1815	21287	17753	43	1200	16301	10088	39	7749	9	26.47%	
<b>GLASCOCK</b>	2556	218	12	2309	1947	163	6	1761	199	-80	145	-63	-27.88%	
GLYNN	67568	18147	2019	46566	50460	11922	1380	36533	5072	2206	4207	1562	15.08%	Brunswick,
GORDON	44104	1633	3268	38642	32606	1104	2318	28782	9032	312	7032	214	24.04%	Calhoun,
GRADY	23659	7207	1222	14954	17206	4708	827	11473	3380	812	2653	572	13.83%	
GREENE	14406	6434	420	7481	10792	4284	267	6181	2613	547	2609	626	17.11%	

County (Metro Atlanta in Bold)									1990 -2000 Change					MSAs
	2000 Pop	AP Black	Latino	NH White	18+ Pop	18+ AP Bl	18+ Latino	NH18+ White	Pop Change	Black Pop Change	Black 18+ Pop Change	Black 18+Pop change	% Black 18+Pop change	
<b>GWINNETT</b>	588448	81804	64137	394164	422455	54593	44167	289400	235538	63629	168259	41685	322.94%	Atlanta-Sandy Spring
HABERSHAM	35902	1708	2750	30486	27471	1378	1707	23711	8281	154	6384	13	0.95%	Cornelia,
HALL	139277	10486	27242	98942	101760	7092	17424	75382	43849	2291	30791	1607	29.30%	inesville,
<b>HANCOCK</b>	10076	7855	54	2141	7651	5697	44	1885	1168	778	1536	1128	24.69%	Milledgeville,
<b>HARALSON</b>	25690	1443	143	23799	18992	966	97	17691	3724	16	2848	7	0.73%	Atlanta-Sandy Spring
HARRIS	23695	4662	260	18444	17630	3344	186	13853	5907	91	4342	82	2.51%	Columbus, -AL
HART	22997	4517	196	18087	17595	3121	137	14205	3285	515	2774	529	20.41%	
<b>HEARD</b>	11012	1221	116	9580	7848	856	65	6856	2384	58	1669	92	12.04%	Atlanta-Sandy Spring
<b>HENRY</b>	119341	17976	2692	95550	84480	11865	1690	68770	60600	11908	41955	7570	176.25%	Atlanta-Sandy Spring
HOUSTON	110765	28046	3363	76391	79549	18390	2252	56784	21557	8670	15523	6073	49.31%	Warner Robins,
IRWIN	9931	2585	202	7102	7071	1610	126	5309	1282	-45	904	-14	-0.86%	
JACKSON	41589	3356	1249	36314	30518	2423	793	26894	11584	452	8464	372	18.14%	Jefferson,
<b>JASPER</b>	11426	3145	236	7964	8317	2153	153	5959	2973	205	2249	190	9.68%	Atlanta-Sandy Spring
JEFF DAVIS	12684	1932	651	9992	9230	1302	436	7407	652	98	575	89	7.34%	
<b>JEFFERSON</b>	17266	9756	259	7215	12363	6553	185	5607	-142	56	203	293	4.68%	
<b>JENKINS</b>	8575	3496	287	4766	6132	2280	203	3634	328	84	320	126	5.85%	
JOHNSON	8560	3168	78	5307	5981	1891	54	4034	231	329	91	167	9.69%	Dublin,
JONES	23639	5569	169	17649	17228	4052	102	12888	2900	252	2277	344	9.28%	Macon-Bibb County,
<b>LAMAR</b>	15912	4895	172	10683	12013	3496	128	8274	2874	453	2419	468	15.46%	Atlanta-Sandy Spring
LANIER	7241	1878	126	5122	5258	1288	80	3811	1710	408	1343	341	36.01%	Valdosta,
LAURENS	44874	15619	529	28199	32829	10443	334	21689	4886	2315	4099	1883	22.00%	Dublin,
LEE	24757	3889	300	20203	17168	2722	178	14023	8507	754	6134	547	25.15%	Albany,
LIBERTY	61610	27467	5022	27244	41916	17267	3181	20050	8865	6812	5214	3843	28.63%	Hinesville,
LINCOLN	8348	2883	81	5321	6311	2061	54	4149	906	57	857	147	7.68%	Augusta-Richmond C
LONG	10304	2576	870	6678	6893	1560	541	4687	4102	1234	2571	699	81.18%	Hinesville,
LOWNDES	92115	31767	2447	55992	67981	21440	1655	43485	16134	7526	13241	5744	36.60%	Valdosta,
LUMPKIN	21016	343	728	19381	15914	244	447	14812	6443	105	4889	68	38.64%	
MACON	14074	8419	364	5184	10187	5857	233	4011	960	725	1215	900	18.16%	
MADISON	25730	2216	507	22713	18966	1513	307	16936	4680	367	3532	233	18.20%	Athens-Clarke Count
MARION	7144	2465	413	4182	5119	1636	294	3128	1554	159	1127	93	6.03%	
<b>MCDUFFIE</b>	21231	8045	284	12795	15315	5314	167	9717	1112	725	1107	610	12.97%	Augusta-Richmond C
MCINTOSH	10847	4042	99	6607	7805	2664	55	5007	5257	1736	3813	1121	72.65%	Brunswick,
<b>MERIWETHER</b>	22534	9560	191	12579	16536	6503	134	9747	123	-429	665	57	0.88%	Atlanta-Sandy Spring

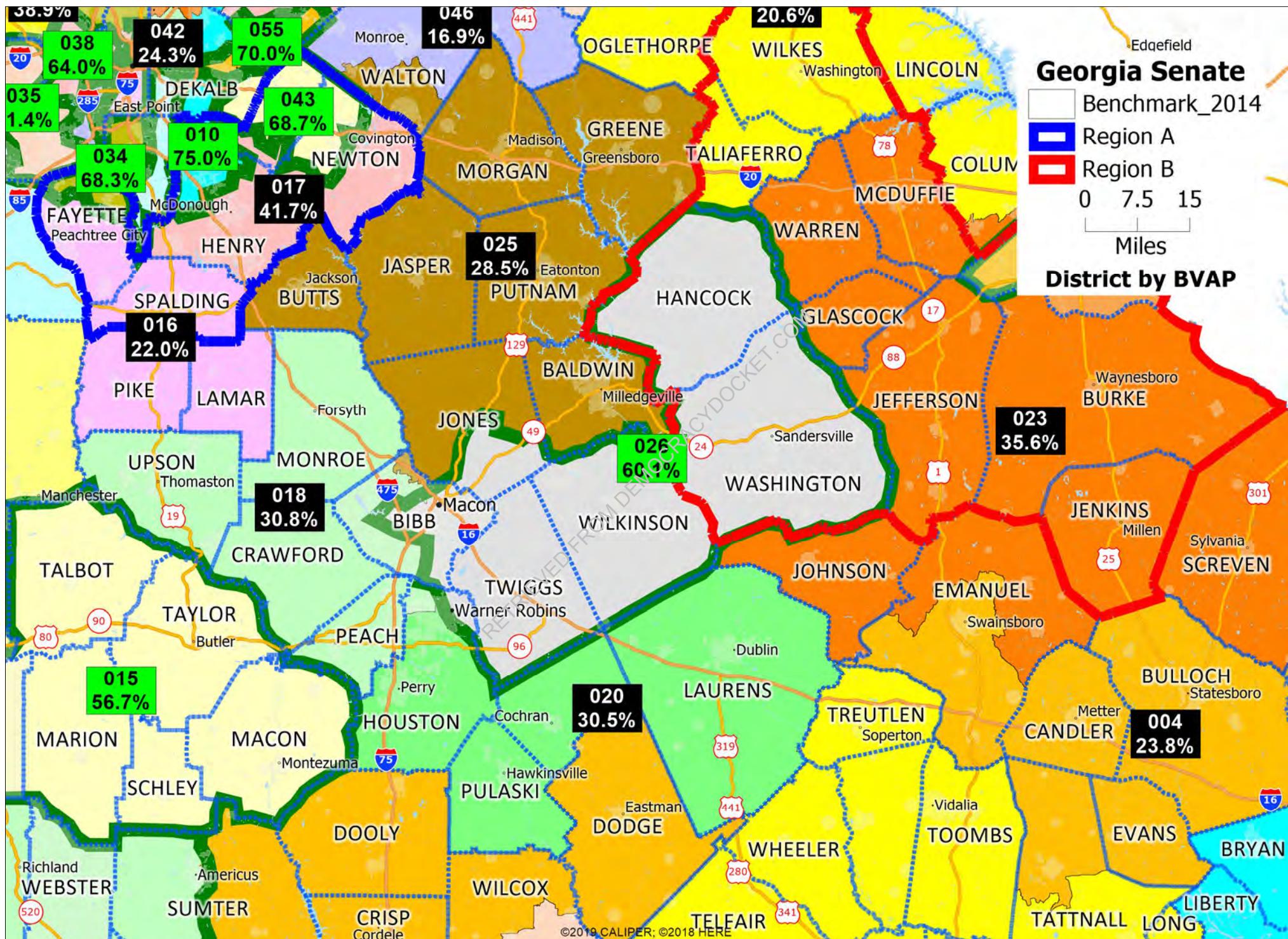
County (Metro Atlanta in Bold)	2000 Pop	AP Black	Latino	NH White	18+ Pop	18+ AP Bl	18+ Latinc	NH18+ White	1990 -2000 Change					MSAs
									Pop Change	Black Pop Change	18+ Pop Change	Black 18+Pop change	% Black 18+Pop change	
MILLER	6383	1848	44	4456	4705	1188	26	3465	103	122	155	96	8.79%	
MITCHELL	23932	11524	491	11746	17392	7827	294	9137	3657	1877	3545	1929	32.71%	
MONROE	21757	6127	281	15150	16044	4423	188	11288	4644	721	3557	574	14.91%	Macon-Bibb County,
MONTGOMERY	8270	2262	271	5684	6199	1669	162	4325	1107	236	898	233	16.23%	Vidalia,
<b>MORGAN</b>	15457	4481	248	10619	11351	3114	159	7996	2574	22	2030	17	0.55%	Atlanta-Sandy Spring
MURRAY	36506	304	2006	33890	26302	169	1223	24692	10359	263	7573	145	604.17%	Dalton,
MUSCOGEE	186291	83157	8372	90668	136289	55832	5772	71510	7013	14996	5452	10698	23.70%	Columbus, -AL
<b>NEWTON</b>	62001	14008	1157	46007	44844	9228	741	34274	20193	4651	14712	2995	48.05%	Atlanta-Sandy Spring
OCONEE	26225	1731	833	23112	18294	1164	520	16259	8607	416	5734	301	34.88%	Athens-Clarke Count
OGLETHORPE	12635	2548	174	9817	9377	1790	115	7401	2872	129	2167	153	9.35%	Athens-Clarke Count
<b>PAULDING</b>	81678	5952	1398	73188	56599	3739	845	51262	40067	4304	27099	2640	240.22%	Atlanta-Sandy Spring
PEACH	23668	10816	998	11654	17505	7886	663	8812	2479	741	2081	809	11.43%	Warner Robins,
<b>PICKENS</b>	22983	308	467	21897	17570	211	313	16827	8551	61	6754	32	17.88%	Atlanta-Sandy Spring
PIERCE	15636	1746	357	13425	11467	1165	231	10009	2308	177	1892	135	13.11%	Waycross,
<b>PIKE</b>	13688	2056	167	11350	9909	1510	99	8229	3464	3	2479	61	4.21%	Atlanta-Sandy Spring
POLK	38127	5209	2921	29684	28190	3523	1862	22577	4312	418	3315	323	10.09%	Cedartown,
PULASKI	9588	3313	270	5932	7372	2433	174	4713	1480	681	1448	713	41.45%	
PUTNAM	18812	5703	407	12471	14444	3855	282	10163	4675	955	3945	699	22.15%	
<b>QUITMAN</b>	2598	1227	13	1351	1975	315	8	1142	389	120	336	83	11.34%	Eufaula, AL-
RABUN	15050	146	683	14023	11764	78	456	11086	3402	105	2674	40	105.26%	
<b>RANDOLPH</b>	7791	4648	92	3016	5662	3147	58	2427	-232	3	-4	185	6.25%	
<b>RICHMOND</b>	199775	101328	5545	88660	146157	67731	3794	71158	10056	21689	7921	15059	28.59%	Augusta-Richmond C
<b>ROCKDALE</b>	70111	13092	4182	50967	50823	8381	2961	38183	16020	8737	12059	5524	193.35%	Atlanta-Sandy Spring
SCHLEY	3766	1194	89	2462	2663	777	52	1825	178	-28	91	-35	-4.31%	Americus,
SCREVEN	15374	6995	147	8182	11083	4680	94	6268	1532	786	1294	732	18.54%	
SEMINOLE	9369	3263	347	5734	6919	2062	225	4598	359	320	274	226	12.31%	
<b>SPALDING</b>	58417	18341	947	38435	42485	11967	632	29386	3960	2556	3338	1839	18.16%	Atlanta-Sandy Spring
STEPHENS	25435	3148	250	21673	19468	2165	165	16880	2178	361	1819	244	12.70%	Toccoa,
<b>STEWART</b>	5252	3261	79	1926	3945	2336	45	1567	-402	-317	-164	-146	-5.88%	Columbus, -AL
<b>SUMTER</b>	33200	16359	891	15672	23968	10756	600	12389	2972	2314	2575	1879	21.17%	Americus,
TALBOT	6498	4037	82	2354	4928	2942	62	1909	-26	-30	171	134	4.77%	Columbus, -AL
<b>TALIAFERRO</b>	2077	1261	19	787	1577	913	13	649	162	94	192	114	14.27%	
TATTNALL	22305	7084	1883	13218	17197	5510	1219	10380	4583	1907	3758	1723	45.50%	

County (Metro Atlanta in Bold)									1990 -2000 Change					MSAs
	2000 Pop	AP Black	Latino	NH White	18+ Pop	18+ AP Blk	18+ Latino	NH18+ White	Pop Change	Black Pop Change	18+ Pop Change	Black 18+Pop change	% Black 18+Pop change	
TAYLOR	8815	3778	163	4847	6446	2549	125	3746	1173	478	940	375	17.25%	
TELFAIR	11794	4568	215	6993	9141	3411	170	5542	794	795	1186	936	37.82%	
<b>TERRELL</b>	<b>10970</b>	<b>6693</b>	<b>136</b>	<b>4101</b>	<b>7856</b>	<b>4394</b>	<b>88</b>	<b>3341</b>	<b>317</b>	<b>316</b>	<b>367</b>	<b>359</b>	<b>8.90%</b>	Albany,
THOMAS	42737	16745	734	24875	31136	11242	471	19129	3751	1986	3309	1684	17.62%	Thomasville,
TIFT	38407	10880	2944	24092	27948	7014	1923	18625	3409	1509	3008	1245	21.58%	Tifton,
TOOMBS	26067	6358	2310	17226	18624	4019	1406	13069	1995	721	1648	530	15.19%	Vidalia,
TOWNS	9319	17	67	9159	7802	16	57	7673	2565	17	2224	16	#DIV/0!	
TREUTLEN	6854	2283	79	4463	5073	1561	58	3433	860	299	782	283	22.14%	Dublin,
TROUP	58779	18919	1004	38261	42406	12489	695	28827	3243	2225	2376	1564	14.32%	LaGrange, -AL
TURNER	9504	3905	244	5315	6707	2456	180	4040	801	371	724	445	22.13%	
TWIGGS	10590	4648	112	5784	7731	3204	83	4407	784	147	922	284	9.73%	Macon-Bibb County,
UNION	17289	111	153	16837	13830	91	125	13474	5296	92	4510	76	506.67%	
UPSON	27597	7757	327	19271	20565	5383	222	14788	1297	485	944	357	7.10%	Thomaston,
WALKER	61053	2458	565	57336	45937	1692	364	43356	2713	212	2620	31	1.87%	Chattanooga, TN-
<b>WALTON</b>	<b>60687</b>	<b>8897</b>	<b>1163</b>	<b>49731</b>	<b>43464</b>	<b>5759</b>	<b>775</b>	<b>36362</b>	<b>22101</b>	<b>1792</b>	<b>15610</b>	<b>1032</b>	<b>21.83%</b>	<b>Atlanta-Sandy Spring</b>
WARE	35483	10032	688	24434	26679	6922	445	19098	12	794	708	821	13.46%	Waycross,
WARREN	6336	3783	51	2483	4666	2570	27	2050	258	127	305	197	8.30%	
WASHINGTON	21176	11325	134	9620	15472	7803	86	7511	2064	1451	1993	1288	19.77%	
WAYNE	26565	5481	1013	19838	19674	3264	720	14922	4209	1123	3813	1154	42.58%	Jesup,
<b>WEBSTER</b>	<b>2390</b>	<b>1125</b>	<b>66</b>	<b>1186</b>	<b>1787</b>	<b>816</b>	<b>43</b>	<b>916</b>	<b>127</b>	<b>-7</b>	<b>149</b>	<b>29</b>	<b>3.68%</b>	
WHEELER	6179	2069	219	3866	4796	1580	150	3046	1276	595	1301	655	70.81%	
WHITE	19944	467	311	18804	15322	344	209	14516	6938	107	5307	87	33.85%	
WHITFIELD	83525	3504	18419	60338	60691	2345	11396	46058	11063	603	7164	330	16.38%	Dalton,
WILCOX	8577	3122	139	5299	6624	2336	92	4178	1569	897	1602	942	67.58%	
<b>WILKES</b>	<b>10687</b>	<b>4642</b>	<b>212</b>	<b>5758</b>	<b>8126</b>	<b>3416</b>	<b>164</b>	<b>4495</b>	<b>90</b>	<b>-267</b>	<b>337</b>	<b>30</b>	<b>0.89%</b>	
WILKINSON	10220	4197	101	5893	7437	2839	74	4501	-8	-105	218	87	3.16%	
WORTH	21967	6532	240	14999	15683	4129	140	11267	2222	481	1928	420	11.32%	Albany,
<b>Total</b>	<b>8186453</b>	<b>2393425</b>	<b>435227</b>	<b>5128661</b>	<b>6017219</b>	<b>1623478</b>	<b>299258</b>	<b>3925585</b>	<b>1711281</b>	<b>648273</b>	<b>1268525</b>	<b>456307</b>		



# EXHIBIT H

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# EXHIBIT I-1

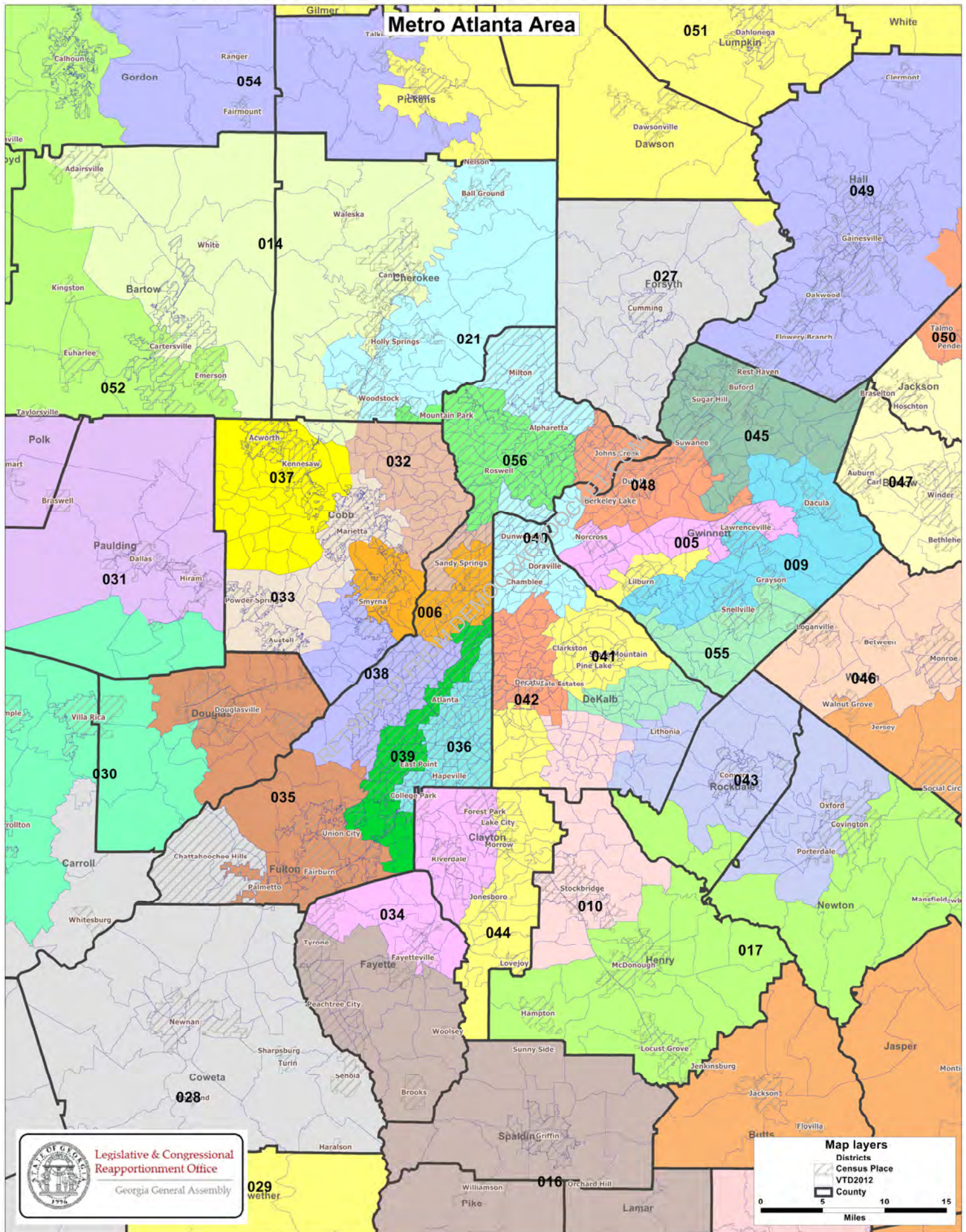
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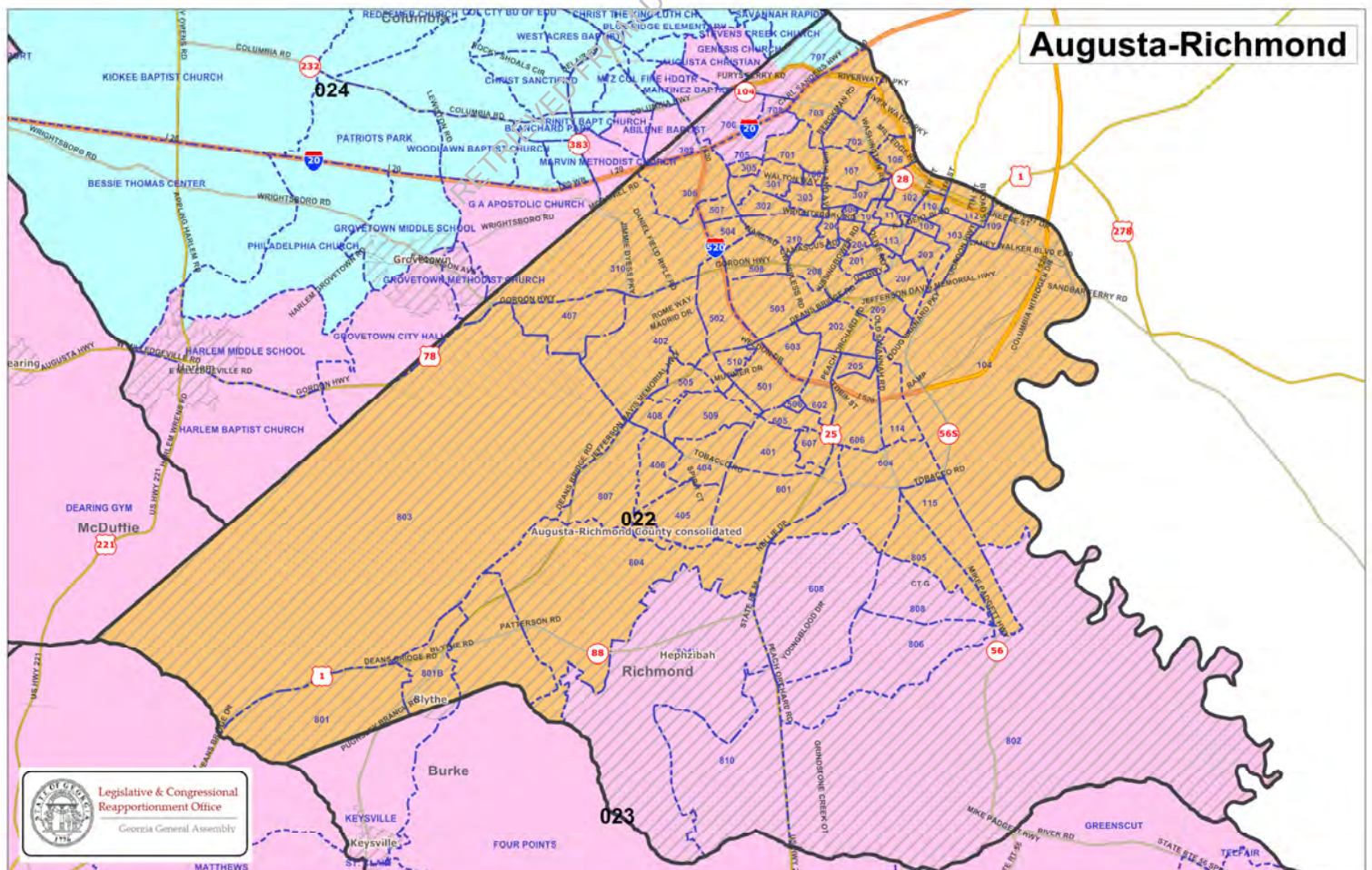
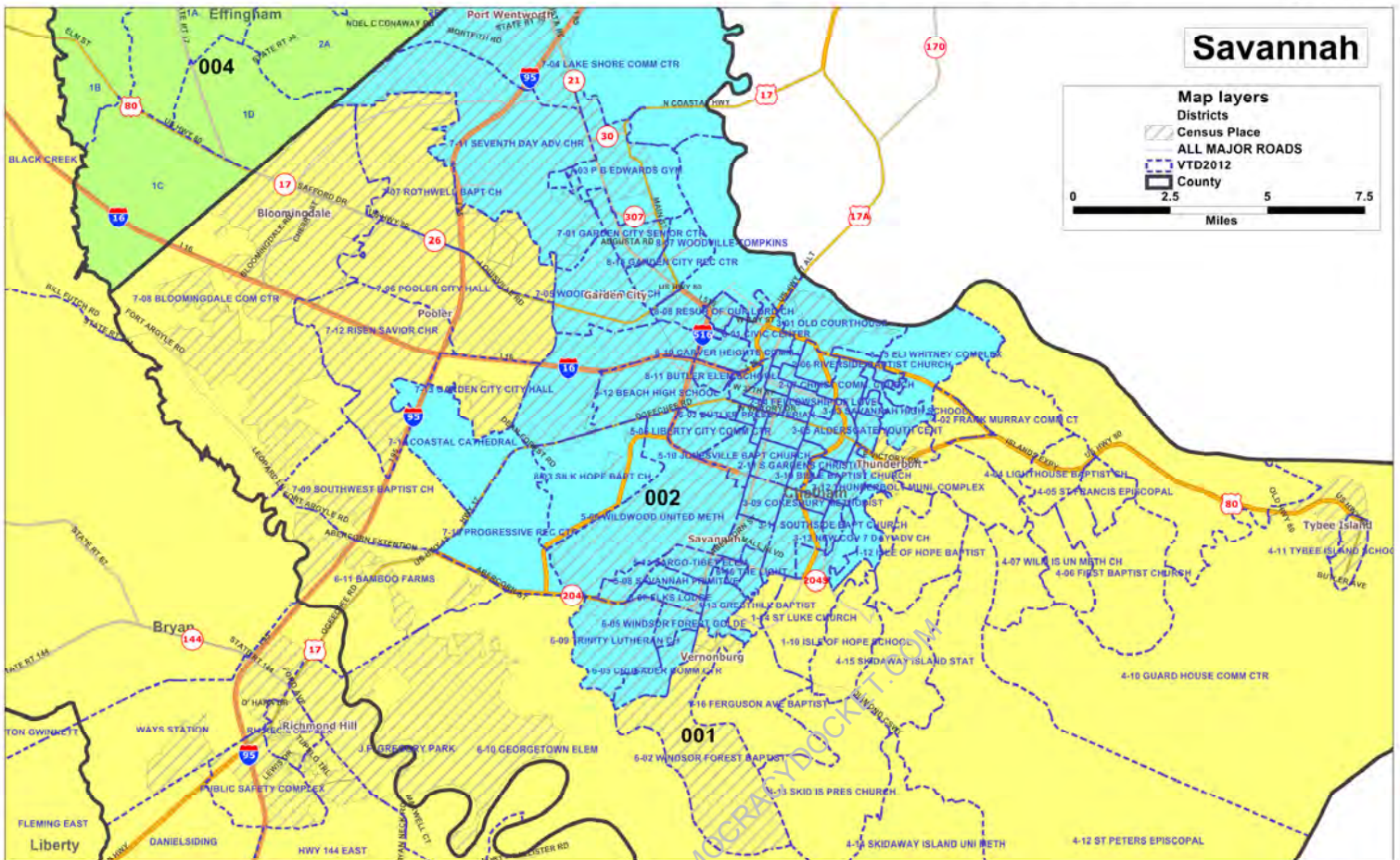
**Georgia Senate Districts- effective for 2014 election**Client: State  
Plan: Senate14  
Type: Senate



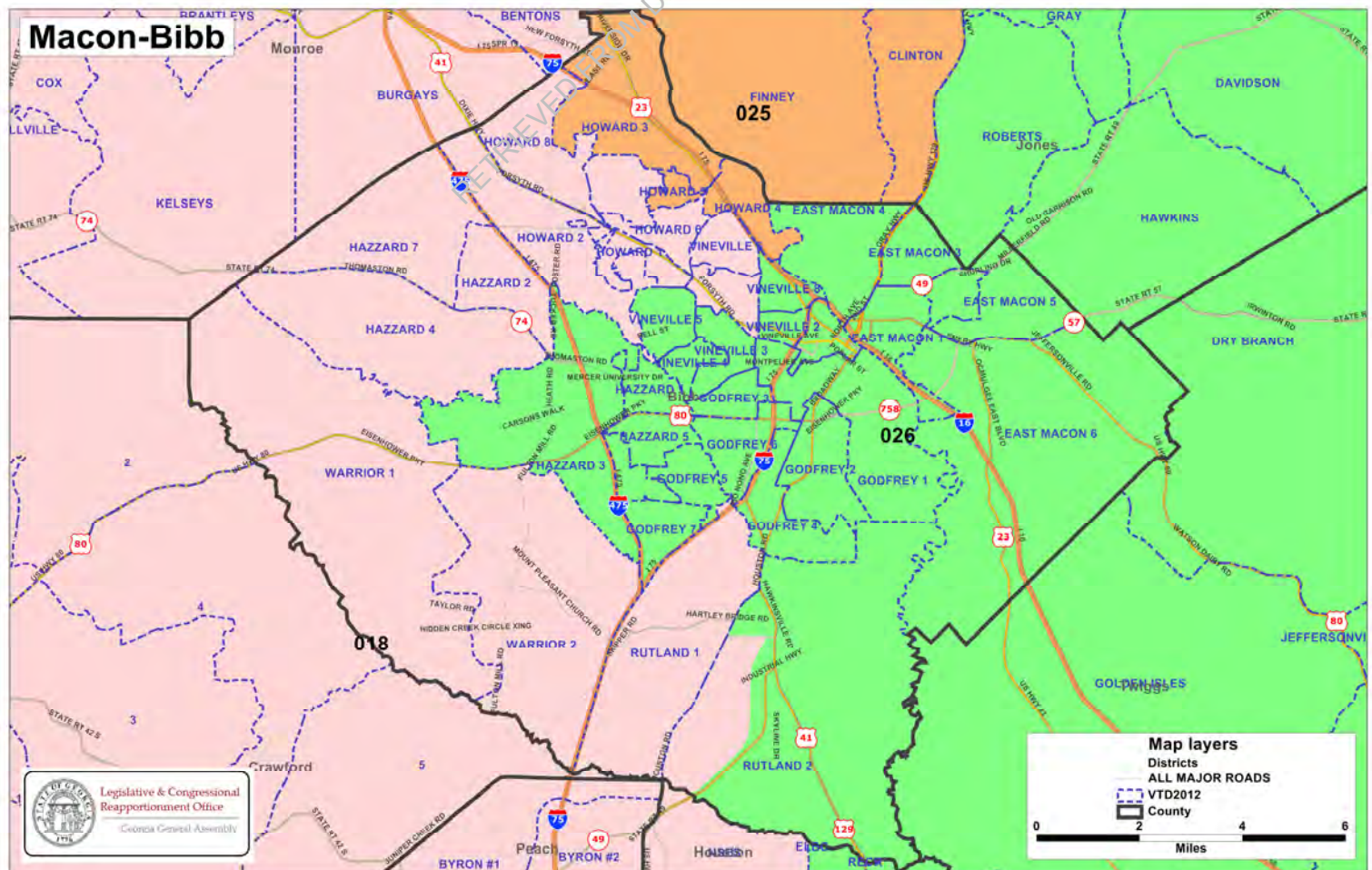
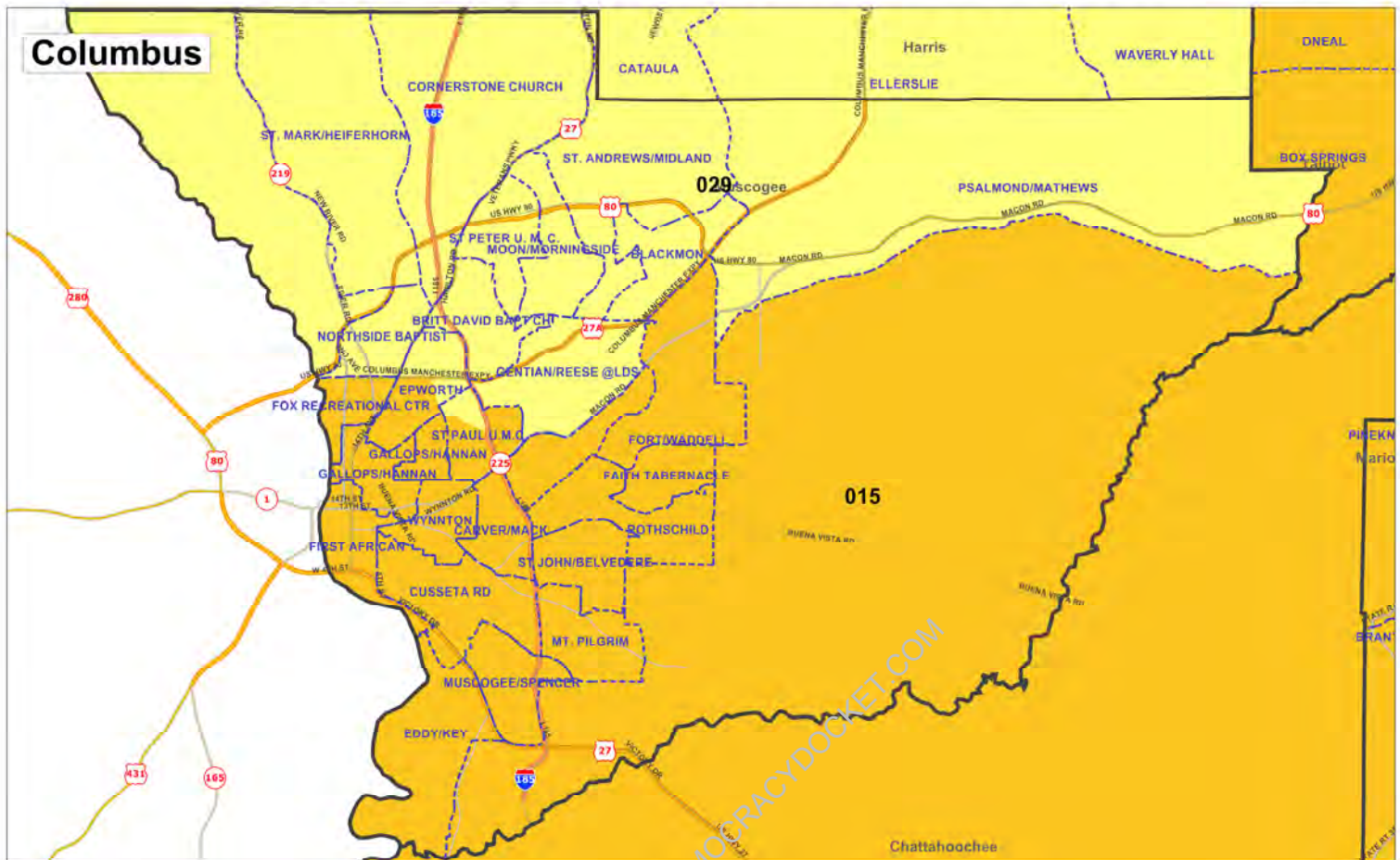
## Georgia Senate Districts- effective for 2014 election

Client: State  
Plant: Senate14  
Type: Senate







**Georgia Senate Districts- effective for 2014 election**Client: State  
Plan: Senate14  
Type: Senate

Plan Name: **Senate14**Plan Type : **Senate**User: **Gina**Administrator: **State**

DISTRICT	POPULATION	DEVIATION	% DEVIATION	BLACK	% BLACK	BLACK COMBO	TOTAL BLACK	%TOTAL BLACK	HISP. OR LATINO	%HISP
001	171,350	-1,644	-0.95%	37,852	22.09%	2,493	40,345	23.55%	10,252	5.98%
VAP	127,614			26,202	20.53%	878	27,080	21.22%	6,353	4.98%
002	172,067	-927	-0.54%	92,824	53.95%	2,226	95,050	55.24%	9,860	5.73%
VAP	132,543			66,470	50.15%	1,050	67,520	50.94%	6,981	5.27%
003	171,952	-1,042	-0.60%	39,606	23.03%	1,755	41,361	24.05%	8,534	4.96%
VAP	129,192			28,065	21.72%	585	28,650	22.18%	5,463	4.23%
004	173,075	81	0.05%	41,571	24.02%	1,245	42,816	24.74%	8,958	5.18%
VAP	131,149			30,454	23.22%	468	30,922	23.58%	5,691	4.34%
005	172,513	-481	-0.28%	49,881	28.91%	2,901	52,782	30.60%	71,815	41.63%
VAP	119,904			33,732	28.13%	1,292	35,024	29.21%	45,746	38.15%
006	173,708	714	0.41%	39,863	22.95%	2,400	42,263	24.33%	24,754	14.25%
VAP	137,161			30,590	22.30%	1,349	31,939	23.29%	16,160	11.78%
007	171,498	-1,496	-0.86%	39,294	22.91%	1,115	40,409	23.56%	11,685	6.81%
VAP	128,245			28,401	22.15%	309	28,710	22.39%	6,972	5.44%
008	171,383	-1,611	-0.93%	56,380	32.90%	1,515	57,895	33.78%	9,198	5.37%
VAP	128,253			40,080	31.25%	592	40,672	31.71%	5,852	4.56%
009	173,867	873	0.50%	34,699	19.96%	2,110	36,809	21.17%	18,207	10.47%
VAP	125,254			22,663	18.09%	832	23,495	18.76%	11,604	9.26%
010	172,386	-608	-0.35%	118,775	68.90%	2,614	121,389	70.42%	7,140	4.14%
VAP	125,304			84,709	67.60%	1,289	85,998	68.63%	4,386	3.50%
011	172,584	-410	-0.24%	57,123	33.10%	959	58,082	33.65%	13,703	7.94%
VAP	127,856			39,947	31.24%	352	40,299	31.52%	8,305	6.50%
012	173,031	37	0.02%	107,565	62.17%	1,262	108,827	62.89%	6,147	3.55%
VAP	130,495			76,605	58.70%	556	77,161	59.13%	4,550	3.49%
013	171,539	-1,455	-0.84%	55,521	32.37%	951	56,472	32.92%	8,156	4.75%
VAP	128,351			39,341	30.65%	314	39,655	30.90%	5,009	3.90%
014	173,151	157	0.09%	15,505	8.95%	1,636	17,141	9.90%	18,976	10.96%
VAP	126,557			10,603	8.38%	465	11,068	8.75%	11,707	9.25%
015	173,280	286	0.17%	96,128	55.48%	2,958	99,086	57.18%	10,633	6.14%
VAP	128,462			69,203	53.87%	1,220	70,423	54.82%	6,935	5.40%

Plan Name: **Senate14**Plan Type : **Senate**User: **Gina**Administrator: **State**

DISTRICT	POPULATION	DEVIATION	% DEVIATION	BLACK	% BLACK	BLACK COMBO	TOTAL BLACK	%TOTAL BLACK	HISP. OR LATINO	%HISP
016	172,012	-982	-0.57%	35,797	20.81%	1,478	37,275	21.67%	7,128	4.14%
VAP	127,450			25,465	19.98%	519	25,984	20.39%	4,552	3.57%
017	171,822	-1,172	-0.68%	51,053	29.71%	2,106	53,159	30.94%	7,980	4.64%
VAP	121,373			33,663	27.74%	747	34,410	28.35%	4,852	4.00%
018	172,982	-12	-0.01%	48,323	27.94%	1,242	49,565	28.65%	6,126	3.54%
VAP	132,567			35,668	26.91%	447	36,115	27.24%	3,906	2.95%
019	173,261	267	0.15%	45,980	26.54%	1,751	47,731	27.55%	15,524	8.96%
VAP	128,915			33,460	25.96%	529	33,989	26.37%	10,084	7.82%
020	173,859	865	0.50%	50,174	28.86%	1,700	51,874	29.84%	7,596	4.37%
VAP	128,979			35,317	27.38%	567	35,884	27.82%	4,759	3.69%
021	174,508	1,514	0.88%	11,300	6.48%	1,358	12,658	7.25%	11,742	6.73%
VAP	125,212			7,721	6.17%	489	8,210	6.56%	7,457	5.96%
022	171,645	-1,349	-0.78%	101,076	58.89%	2,998	104,074	60.63%	7,217	4.20%
VAP	129,039			71,660	55.53%	1,337	72,997	56.57%	4,982	3.86%
023	171,559	-1,435	-0.83%	62,136	36.22%	1,544	63,680	37.12%	5,511	3.21%
VAP	128,048			43,718	34.14%	496	44,214	34.53%	3,559	2.78%
024	172,595	-399	-0.23%	33,638	19.49%	1,599	35,237	20.42%	6,943	4.02%
VAP	129,147			24,539	19.00%	470	25,009	19.36%	4,236	3.28%
025	174,016	1,022	0.59%	52,329	30.07%	1,171	53,500	30.74%	5,684	3.27%
VAP	134,483			38,282	28.47%	378	38,660	28.75%	3,698	2.75%
026	171,351	-1,643	-0.95%	103,229	60.24%	1,561	104,790	61.16%	5,003	2.92%
VAP	126,588			72,782	57.50%	626	73,408	57.99%	3,298	2.61%
027	172,726	-268	-0.15%	4,490	2.60%	778	5,268	3.05%	16,179	9.37%
VAP	120,121			2,998	2.50%	277	3,275	2.73%	10,177	8.47%
028	172,358	-636	-0.37%	28,697	16.65%	1,436	30,133	17.48%	9,562	5.55%
VAP	126,140			20,138	15.96%	414	20,552	16.29%	6,218	4.93%
029	173,911	917	0.53%	45,511	26.17%	1,733	47,244	27.17%	7,317	4.21%
VAP	131,011			32,576	24.87%	552	33,128	25.29%	4,795	3.66%
030	172,531	-463	-0.27%	33,612	19.48%	2,207	35,819	20.76%	10,302	5.97%
VAP	125,663			23,275	18.52%	700	23,975	19.08%	6,291	5.01%

Plan Name: **Senate14**Plan Type : **Senate**User: **Gina**Administrator: **State**

DISTRICT	POPULATION	DEVIATION	% DEVIATION	BLACK	% BLACK	BLACK COMBO	TOTAL BLACK	%TOTAL BLACK	HISP. OR LATINO	%HISP
031	174,298	1,304	0.75%	23,616	13.55%	1,798	25,414	14.58%	10,762	6.17%
VAP	124,828			15,799	12.66%	511	16,310	13.07%	6,220	4.98%
032	174,271	1,277	0.74%	14,817	8.50%	1,334	16,151	9.27%	9,811	5.63%
VAP	130,854			10,791	8.25%	542	11,333	8.66%	6,539	5.00%
033	174,114	1,120	0.65%	62,936	36.15%	3,058	65,994	37.90%	33,571	19.28%
VAP	128,718			43,422	33.73%	1,379	44,801	34.81%	20,775	16.14%
034	173,063	69	0.04%	108,169	62.50%	2,853	111,022	64.15%	24,642	14.24%
VAP	123,516			75,265	60.94%	1,375	76,640	62.05%	15,146	12.26%
035	173,728	734	0.42%	107,338	61.79%	3,013	110,351	63.52%	13,774	7.93%
VAP	122,650			72,472	59.09%	1,309	73,781	60.16%	8,213	6.70%
036	172,083	-911	-0.53%	103,348	60.06%	2,338	105,686	61.42%	12,232	7.11%
VAP	137,631			78,481	57.02%	1,630	80,111	58.21%	8,800	6.39%
037	172,832	-162	-0.09%	30,548	17.67%	1,919	32,467	18.79%	13,258	7.67%
VAP	126,053			20,606	16.35%	802	21,408	16.98%	8,429	6.69%
038	174,530	1,536	0.89%	110,537	63.33%	2,421	112,958	64.72%	17,411	9.98%
VAP	129,186			80,556	62.36%	1,289	81,845	63.35%	10,835	8.39%
039	173,809	815	0.47%	110,761	63.73%	2,303	113,064	65.05%	9,651	5.55%
VAP	139,465			83,562	59.92%	1,557	85,119	61.03%	6,962	4.99%
040	173,539	545	0.32%	26,747	15.41%	1,754	28,501	16.42%	36,807	21.21%
VAP	133,946			20,482	15.29%	1,010	21,492	16.05%	25,354	18.93%
041	173,452	458	0.26%	90,037	51.91%	2,732	92,769	53.48%	23,281	13.42%
VAP	127,577			64,136	50.27%	1,444	65,580	51.40%	14,850	11.64%
042	172,447	-547	-0.32%	42,913	24.88%	1,779	44,692	25.92%	24,229	14.05%
VAP	138,757			33,570	24.19%	1,094	34,664	24.98%	16,922	12.20%
043	172,105	-889	-0.51%	105,035	61.03%	2,631	107,666	62.56%	12,251	7.12%
VAP	123,175			71,792	58.28%	1,213	73,005	59.27%	7,461	6.06%
044	174,464	1,470	0.85%	122,966	70.48%	2,787	125,753	72.08%	14,561	8.35%
VAP	127,853			87,966	68.80%	1,378	89,344	69.88%	9,051	7.08%
045	173,558	564	0.33%	24,226	13.96%	1,927	26,153	15.07%	22,225	12.81%
VAP	120,526			15,902	13.19%	691	16,593	13.77%	13,760	11.42%



Plan Name: **Senate14**Plan Type : **Senate**User: **Gina**Administrator: **State**

DISTRICT	POPULATION	DEVIATION	% DEVIATION	BLACK	% BLACK	BLACK COMBO	TOTAL BLACK	%TOTAL BLACK	HISP. OR LATINO	%HISP
046	174,230	1,236	0.71%	30,244	17.36%	1,313	31,557	18.11%	8,606	4.94%
VAP	135,912			21,845	16.07%	563	22,408	16.49%	5,673	4.17%
047	174,417	1,423	0.82%	25,803	14.79%	1,534	27,337	15.67%	16,455	9.43%
VAP	129,264			18,117	14.02%	489	18,606	14.39%	9,911	7.67%
048	171,240	-1,754	-1.01%	25,398	14.83%	1,929	27,327	15.96%	21,232	12.40%
VAP	122,833			17,133	13.95%	794	17,927	14.59%	13,645	11.11%
049	173,823	829	0.48%	12,877	7.41%	1,070	13,947	8.02%	44,504	25.60%
VAP	125,571			9,143	7.28%	322	9,465	7.54%	25,911	20.63%
050	171,792	-1,202	-0.69%	9,219	5.37%	1,099	10,318	6.01%	13,621	7.93%
VAP	131,117			6,960	5.31%	256	7,216	5.50%	7,940	6.06%
051	173,593	599	0.35%	1,471	0.85%	498	1,969	1.13%	7,454	4.29%
VAP	136,858			1,128	0.82%	148	1,276	0.93%	4,570	3.34%
052	172,494	-500	-0.29%	19,604	11.37%	1,418	21,022	12.19%	18,234	10.57%
VAP	128,253			13,936	10.87%	368	14,304	11.15%	10,849	8.46%
053	173,151	157	0.09%	7,102	4.10%	1,091	8,193	4.73%	3,905	2.26%
VAP	132,044			5,563	4.21%	239	5,802	4.39%	2,345	1.78%
054	173,417	423	0.24%	4,520	2.61%	968	5,488	3.16%	38,990	22.48%
VAP	125,379			3,377	2.69%	250	3,627	2.89%	22,395	17.86%
055	174,196	1,202	0.69%	114,253	65.59%	3,254	117,507	67.46%	11,564	6.64%
VAP	123,203			78,012	63.32%	1,571	79,583	64.60%	6,951	5.64%
056	174,487	1,493	0.86%	26,018	14.91%	2,040	28,058	16.08%	22,826	13.08%
VAP	129,856			19,127	14.73%	996	20,123	15.50%	14,917	11.49%

Total Population: 9,687,653

Ideal Value: 172,994

**Summary Statistics**

Population Range: 171,240 to 174,530

Absolute Overall Range: 3,290

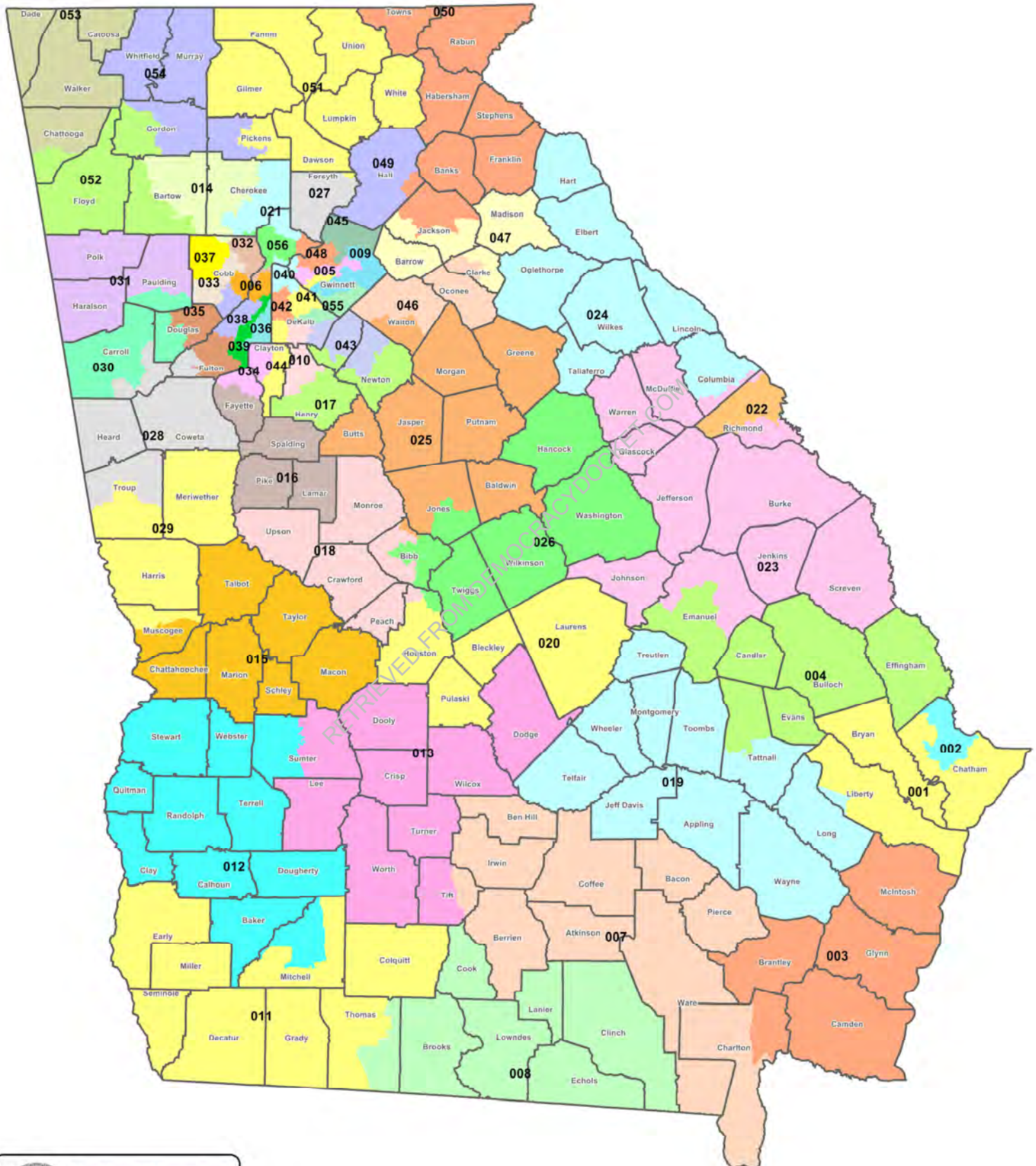
Relative Range: -1.01% to 0.89%

Relative Overall Range: 1.90%

# EXHIBIT I-2

RETRIEVED FROM DEMOCRACYDOCKET.COM



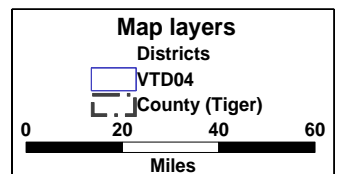
**Proposed Georgia Senate Districts**Client: S028  
Plan: senprop1  
Type: Senate

# EXHIBIT I-3

RETRIEVED FROM DEMOCRACYDOCKET.COM

# Georgia Senate Districts 2006

Client: State  
Plan: Senate06  
Type: Senate



# EXHIBIT J-1

RETRIEVED FROM DEMOCRACYDOCKET.COM



## Georgia State Senate --2014 Benchmark Plan

District	2020 Pop.	% 2020 Deviation	18+ Pop	18+ AP Black	% 18+ AP Black	18+ NH White	% 18+ NH White	2015-19 BCVAP*	2015-19 LCVAP*	2015-19 ACVAP*	2015-19 B+L+A CVAP*	2015-19 NH White CVAP*
001	198887	3.97%	152297	35451	23.28%	96772	63.54%	22.69%	5.60%	2.50%	30.79%	68.07%
002	189492	-0.94%	150134	70693	47.09%	60178	40.08%	53.43%	4.30%	1.46%	59.18%	40.00%
003	177449	-7.23%	138541	28640	20.67%	95762	69.12%	22.80%	3.18%	1.40%	27.39%	71.81%
004	193292	1.05%	147437	35090	23.80%	99258	67.32%	24.14%	2.82%	0.76%	27.72%	71.45%
005	196143	2.54%	142732	43538	30.50%	23318	16.34%	39.22%	19.37%	13.57%	72.16%	26.68%
006	210532	10.06%	172356	43196	25.06%	92734	53.80%	25.05%	5.73%	4.64%	35.42%	64.09%
007	171471	-10.36%	130540	30505	23.37%	88112	67.50%	24.31%	3.43%	0.47%	28.21%	71.23%
008	179719	-6.05%	135732	46162	34.01%	77098	56.80%	33.19%	4.02%	1.18%	38.39%	60.73%
009	208385	8.94%	154183	44050	28.57%	70409	45.67%	25.32%	8.13%	8.70%	42.15%	56.96%
010	189350	-1.01%	146159	109589	74.98%	24225	16.57%	73.45%	3.29%	2.66%	79.39%	19.99%
011	176167	-7.90%	134129	43418	32.37%	77682	57.92%	34.09%	3.11%	0.59%	37.78%	61.39%
012	156514	-18.18%	122414	76043	62.12%	39684	32.42%	63.31%	1.39%	0.68%	65.38%	34.05%
013	166659	-12.87%	128573	40500	31.50%	78559	61.10%	32.60%	2.73%	0.91%	36.23%	63.09%
014	201621	5.40%	153905	16759	10.89%	111171	72.23%	10.68%	6.08%	1.75%	18.52%	80.36%
015	167658	-12.35%	127245	72150	56.70%	43673	34.32%	55.52%	5.54%	1.20%	62.26%	36.50%
016	185112	-3.23%	142191	31282	22.00%	96558	67.91%	21.58%	3.25%	1.96%	26.79%	72.18%
017	203628	6.45%	151694	63292	41.72%	74437	49.07%	35.83%	3.75%	1.13%	40.71%	58.47%
018	181317	-5.21%	142464	43919	30.83%	87228	61.23%	30.31%	2.09%	1.11%	33.52%	65.66%
019	171580	-10.30%	130086	35842	27.55%	80326	61.75%	28.65%	4.82%	0.49%	33.95%	65.24%
020	194874	1.88%	146865	44728	30.46%	88596	60.32%	30.31%	3.34%	1.99%	35.64%	63.45%
021	213660	11.70%	161932	12410	7.66%	120173	74.21%	7.30%	4.78%	3.41%	15.49%	83.83%
022	177079	-7.43%	137131	80572	58.76%	44194	32.23%	60.81%	4.00%	1.50%	66.31%	32.82%
023	172283	-9.93%	133828	47670	35.62%	76938	57.49%	34.71%	2.44%	1.16%	38.31%	60.89%
024	201121	5.14%	152283	31388	20.61%	104217	68.44%	20.74%	3.65%	2.67%	27.06%	72.23%
025	184090	-3.76%	146057	41632	28.50%	94913	64.98%	30.11%	2.17%	0.99%	33.27%	66.32%
026	162113	-15.25%	123874	74504	60.14%	42998	34.71%	60.87%	1.71%	0.71%	63.28%	36.27%
027	247844	29.57%	178599	8702	4.87%	119868	67.12%	3.95%	5.33%	7.35%	16.63%	82.62%
028	193759	1.29%	148139	25846	17.45%	106941	72.19%	17.43%	4.00%	1.42%	22.85%	76.32%
029	190152	-0.59%	146692	41511	28.30%	89648	61.11%	28.79%	3.92%	2.16%	34.87%	64.43%
030	185628	-2.96%	140487	32442	23.09%	92957	66.17%	22.57%	3.58%	1.07%	27.23%	71.80%
031	200874	5.01%	148856	26030	17.49%	107611	72.29%	14.69%	4.17%	0.65%	19.51%	79.72%
032	191820	0.28%	146090	15068	10.31%	100623	68.88%	9.43%	4.72%	6.29%	20.45%	78.78%
033	194620	1.74%	149098	57946	38.86%	54199	36.35%	42.38%	9.42%	2.68%	54.48%	44.66%
034	193843	1.34%	143989	98409	68.34%	20582	14.29%	71.98%	5.24%	3.44%	80.65%	18.33%
035	207451	8.45%	155438	110949	71.33%	29749	19.14%	68.38%	4.15%	0.96%	73.49%	25.68%
036	194797	1.84%	160571	86374	53.79%	55677	34.67%	55.27%	3.64%	2.85%	61.76%	37.72%
037	192450	0.61%	149015	32301	21.68%	93201	62.54%	20.68%	5.28%	3.58%	29.54%	69.66%
038	194347	1.60%	149483	95641	63.98%	35249	23.58%	68.29%	4.41%	1.98%	74.69%	24.80%
039	205632	7.50%	170381	98993	58.10%	50264	29.50%	62.02%	2.97%	3.59%	68.58%	30.69%
040	195569	2.24%	151062	27069	17.92%	76038	50.34%	19.37%	6.80%	8.03%	34.21%	65.14%
041	196140	2.54%	146663	72979	49.76%	31519	21.49%	57.22%	6.08%	7.27%	70.57%	28.32%
042	188406	-1.50%	151516	36776	24.27%	82267	54.30%	27.82%	3.82%	5.74%	37.38%	61.71%
043	196565	2.76%	148422	102018	68.74%	33974	22.89%	66.24%	3.75%	1.45%	71.44%	27.81%
044	198371	3.70%	151932	110050	72.43%	22257	14.65%	74.99%	4.65%	3.54%	83.17%	15.89%
045	214703	12.24%	158272	29023	18.34%	80234	50.69%	17.75%	7.78%	10.08%	35.62%	63.70%
046	203757	6.52%	160011	27059	16.91%	113961	71.22%	18.37%	3.08%	2.76%	24.21%	75.11%
047	202081	5.64%	154098	23646	15.34%	105856	68.69%	15.67%	5.12%	2.23%	23.02%	76.30%
048	197406	3.20%	151281	28527	18.86%	57510	38.02%	20.30%	7.68%	20.19%	48.17%	50.90%
049	196756	2.86%	149277	11752	7.87%	96626	64.73%	8.65%	11.42%	2.05%	22.11%	77.08%
050	186077	-2.72%	145138	8642	5.95%	119197	82.13%	6.33%	4.30%	1.03%	11.66%	87.35%
051	193626	1.22%	158512	1962	1.24%	142807	90.09%	1.37%	2.34%	0.49%	4.20%	94.12%
052	179411	-6.21%	137797	16207	11.76%	101967	74.00%	11.79%	4.98%	0.90%	17.67%	81.60%
053	174643	-8.70%	135994	6402	4.71%	120228	88.41%	4.66%	1.45%	0.74%	6.86%	92.13%
054	176410	-7.78%	132248	4100	3.10%	95114	71.92%	3.35%	11.02%	0.79%	15.16%	83.25%
055	199509	4.30%	149542	104737	70.04%	26486	17.71%	72.06%	3.70%	1.73%	77.50%	21.77%
056	189065	-1.16%	146889	23796	16.20%	90510	61.62%	17.68%	5.90%	6.17%	29.75%	69.41%
<b>Total 2020</b>												
<b>Pop.</b>	<b>10,711,908</b>	<b>47.75%</b>	<b>8,220,274</b>	<b>2,607,986</b>	<b>31.73%</b>	<b>4,342,333</b>	<b>52.82%</b>					

## Majority Districts

13

15

17

39

## CVAP Source:

\* 2015-19 ACS Special Tabulation

Note: Citizen Voting Age Population (CVAP) percentages are disaggregated from block-group level ACS estimates (with a survey midpoint of July 2017)

Source for disaggregation: Redistricting Data Hub

<https://redistrictingdatahub.org/dataset/georgia-cvap-data-disaggregated-to-the-2020-block-level-2019/>

# EXHIBIT J-2

RETRIEVED FROM DEMOCRACYDOCKET.COM



## Population Summary Report

### Georgia State Senate -2011 Plan

											2006-2010
District	2020 Pop.	% 2020		18+ AP	% 18+ AP	18+_NH	% 18+ NH	2006-2010	2006-2010	2006-2010	B+L+A
		Deviation	18+ Pop	Black	Black	White	White	BCVAP*	LCVAP*	ACVAP*	CVAP*
001	171350	-0.95%	127614	27080	21.2%	89831	70.39%	20.07%	3.90%	2.00%	25.97%
002	172067	-0.54%	132543	67520	50.9%	54497	41.12%	53.36%	2.44%	1.13%	56.93%
003	171952	-0.60%	129192	28650	22.2%	92672	71.73%	22.46%	2.43%	0.74%	25.63%
004	173075	0.05%	131149	30922	23.6%	92265	70.35%	23.57%	1.64%	0.62%	25.83%
005	172323	-0.39%	119823	34545	28.8%	27743	23.15%	37.43%	12.69%	9.70%	59.82%
006	173708	0.41%	137161	31939	23.3%	81413	59.36%	21.15%	3.24%	2.60%	26.99%
007	171777	-0.70%	128025	27351	21.4%	92252	72.06%	22.07%	2.05%	0.06%	24.18%
008	171383	-0.93%	128253	40672	31.7%	79220	61.77%	31.99%	1.87%	0.67%	34.53%
009	173867	0.50%	125254	23495	18.8%	79744	63.67%	15.89%	3.88%	6.64%	26.41%
010	172386	-0.35%	125304	85998	68.6%	31542	25.17%	67.49%	2.23%	2.05%	71.77%
011	172584	-0.24%	127856	40299	31.5%	77812	60.86%	33.06%	1.98%	0.29%	35.33%
012	172926	-0.04%	130407	77155	59.2%	47349	36.31%	59.83%	1.10%	0.36%	61.29%
013	171365	-0.94%	128659	41020	31.9%	80830	62.82%	32.27%	1.88%	0.44%	34.59%
014	173151	0.09%	126557	11068	8.8%	100580	79.47%	8.76%	3.51%	1.03%	13.30%
015	173280	0.17%	128462	70423	54.8%	49110	38.23%	52.78%	3.55%	0.80%	57.13%
016	172012	-0.57%	127450	25984	20.4%	93645	73.48%	19.93%	1.99%	0.92%	22.84%
017	171822	-0.68%	121373	34410	28.4%	79927	65.85%	24.92%	2.66%	1.07%	28.65%
018	172982	-0.01%	132567	36115	27.2%	89587	67.58%	27.40%	1.65%	0.79%	29.84%
019	173261	0.15%	128915	33989	26.4%	83563	64.82%	27.37%	3.49%	0.33%	31.19%
020	173859	0.50%	128979	35884	27.8%	84987	65.89%	27.68%	2.00%	1.32%	31.00%
021	174508	0.88%	125212	8210	6.6%	101929	81.41%	5.89%	3.15%	2.14%	11.18%
022	171645	-0.78%	129039	72997	56.6%	48103	37.28%	55.66%	3.10%	1.26%	60.02%
023	172187	-0.47%	128540	44335	34.5%	78094	60.75%	34.57%	1.03%	0.65%	36.25%
024	171967	-0.59%	128655	24888	19.3%	95312	74.08%	19.50%	2.09%	1.85%	23.44%
025	174016	0.59%	134483	38660	28.8%	89944	66.88%	29.18%	1.35%	0.51%	31.04%
026	171351	-0.95%	126588	73408	58.0%	48667	58.45%	57.89%	1.11%	0.58%	59.58%
027	172726	-0.15%	120121	3275	2.7%	98446	81.96%	2.12%	3.37%	2.78%	8.27%
028	172358	-0.37%	126140	20552	16.3%	96736	76.69%	16.18%	2.45%	0.73%	19.36%
029	173911	0.53%	131011	33128	25.3%	89031	67.96%	26.03%	2.47%	1.41%	29.91%
030	172531	-0.27%	125663	23975	19.1%	93513	74.42%	18.06%	2.19%	0.56%	20.81%
031	174298	0.75%	124828	16310	13.1%	100359	80.40%	11.74%	2.53%	0.61%	14.88%
032	174271	0.74%	130854	11333	8.7%	102432	78.28%	8.75%	2.90%	4.29%	15.94%
033	174114	0.65%	128718	44801	34.8%	59010	45.84%	36.47%	5.14%	1.63%	43.24%
034	173063	0.04%	123516	76640	52.1%	26225	21.23%	64.69%	4.28%	3.71%	72.68%
035	173728	0.42%	122650	73781	60.2%	39009	31.81%	58.56%	2.88%	1.01%	62.45%
036	172083	-0.53%	137631	80111	58.2%	45549	33.10%	58.93%	2.84%	2.36%	64.13%
037	172832	-0.09%	126053	21408	17.0%	90383	71.70%	14.74%	3.86%	3.06%	21.66%
038	174530	0.89%	129186	81845	63.4%	33635	26.04%	68.01%	2.82%	1.36%	72.19%
039	173809	0.47%	139465	85119	61.0%	40407	28.97%	62.14%	2.33%	1.89%	66.36%
040	173539	0.32%	133946	21492	16.1%	74299	55.47%	16.17%	4.92%	6.06%	27.15%
041	173452	0.26%	127577	65580	51.4%	34734	27.23%	55.70%	4.08%	5.28%	65.06%
042	172447	-0.32%	138757	34664	25.0%	76721	55.29%	26.54%	3.61%	3.44%	33.59%
043	172105	-0.51%	123175	73005	59.3%	41279	33.51%	55.95%	2.19%	1.05%	59.19%
044	174464	0.85%	127853	89344	69.9%	24598	19.24%	71.85%	3.07%	2.30%	77.22%
045	173558	0.33%	120526	16593	13.8%	77283	64.12%	13.44%	5.74%	6.32%	25.50%
046	174230	0.71%	135912	22408	16.5%	102352	75.31%	16.77%	1.86%	1.95%	20.58%
047	174417	0.82%	129264	18606	14.4%	96620	74.75%	14.27%	3.16%	1.60%	19.03%
048	171430	-0.90%	122914	18406	15.0%	60176	48.96%	16.51%	4.70%	14.45%	35.66%
049	173823	0.48%	125571	9465	7.5%	87303	69.52%	8.32%	6.14%	1.36%	15.82%
050	171792	-0.69%	131117	7216	5.5%	113429	86.51%	5.27%	1.85%	0.73%	7.85%
051	173593	0.35%	136858	1276	0.9%	128844	94.14%	0.80%	1.41%	0.23%	2.44%
052	172494	-0.29%	128253	14304	11.2%	100866	78.65%	10.80%	2.49%	0.77%	14.06%
053	173151	0.09%	132044	5802	4.4%	121629	92.11%	4.32%	1.21%	0.43%	5.96%
054	173417	0.24%	125379	3627	2.9%	97436	77.71%	3.20%	6.52%	0.47%	10.19%
055	174196	0.69%	123203	79583	64.6%	33740	27.39%	63.88%	2.40%	1.91%	68.19%
056	174,487	0.86%	129,856	20123	15.5%	85,852	66.11%	0.14	3.46%	3.47%	20.93%

**CVAP Source:**

\* 2006-10 ACS Special Tabulation

Note: Citizen Voting Age Population (CVAP) percentages are disaggregated from block-group level ACS estimates (with a survey midpoint of July 2017)

# EXHIBIT J-3

RETRIEVED FROM DEMOCRACYDOCKET.COM

## Population Summary Report -- 2010 Census

### Georgia State Senate -2006 Benchmark Plan

District	2010 Pop.	% 2010		18+ AP	% 18+ AP	18+_NH	% 18+ NH	2006-2010		2006-2010		2006-2010	B+L+A
		Deviation	18+ Pop					BCVAP*	LCVAP*	ACVAP*	CVAP*		
001	184711	6.77%	138727	28211	20.34%	99045	71.40%	19.04%	3.71%	1.92%	24.67%		
002	145784	-15.73%	112658	61726	54.79%	42284	37.53%	57.54%	2.07%	1.03%	60.64%		
003	175054	1.19%	131558	28706	21.82%	94902	72.14%	22.04%	2.40%	0.73%	25.17%		
004	182797	5.67%	138452	33267	24.03%	97083	70.12%	24.09%	1.57%	0.58%	26.24%		
005	165465	-4.35%	116283	33067	28.44%	21463	18.46%	40.07%	13.89%	10.37%	64.33%		
006	166643	-3.67%	126854	47911	37.77%	54761	43.17%	39.41%	4.53%	2.56%	46.50%		
007	162770	-5.91%	120774	24525	20.31%	87389	72.36%	21.43%	2.19%	0.14%	23.76%		
008	165743	-4.19%	124564	44682	35.87%	72509	58.21%	35.97%	1.94%	0.68%	38.59%		
009	203621	17.70%	145121	38197	26.32%	75722	52.18%	23.89%	5.40%	6.37%	35.66%		
010	173450	0.26%	127296	85751	67.36%	35990	28.27%	66.52%	1.92%	0.92%	69.36%		
011	149726	-13.45%	110742	32490	29.34%	69166	62.46%	30.87%	2.01%	0.24%	33.12%		
012	141413	-18.26%	106402	64913	61.01%	38212	35.91%	60.86%	1.04%	0.31%	62.21%		
013	150866	-12.79%	111625	31860	28.54%	73782	66.10%	28.86%	1.67%	0.45%	30.98%		
014	158067	-8.63%	121156	52475	43.31%	61431	50.70%	44.67%	1.42%	0.40%	46.49%		
015	133879	-22.61%	98798	54594	55.26%	36113	36.55%	52.77%	4.36%	1.03%	58.16%		
016	165379	-4.40%	122416	27345	22.34%	87358	71.36%	22.30%	2.11%	0.96%	25.37%		
017	238272	37.73%	169706	48961	28.85%	111309	65.59%	25.89%	2.34%	1.09%	29.32%		
018	181223	4.76%	135340	30636	22.64%	95435	70.51%	22.18%	2.17%	1.19%	25.54%		
019	161882	-6.42%	118661	32286	27.21%	75769	63.85%	28.34%	3.90%	0.55%	32.79%		
020	176026	1.75%	134154	40285	30.03%	87131	64.95%	30.48%	1.52%	0.89%	32.89%		
021	171113	-1.09%	125264	8607	6.87%	102102	81.51%	6.68%	3.51%	2.19%	12.38%		
022	138542	-19.92%	103278	62421	60.44%	35770	34.63%	59.52%	2.77%	1.07%	63.36%		
023	153242	-11.42%	115804	46613	40.25%	62952	54.36%	39.61%	1.57%	0.74%	41.92%		
024	182334	5.40%	134569	28263	21.00%	96242	71.52%	21.01%	2.35%	2.09%	25.45%		
025	160177	-7.41%	125124	42949	34.33%	77377	61.84%	35.94%	1.21%	0.39%	37.54%		
026	135905	-21.44%	99895	59270	59.33%	36366	36.40%	58.03%	1.45%	0.79%	60.27%		
027	264822	53.08%	186205	6478	3.48%	154737	83.10%	2.82%	3.59%	2.09%	8.50%		
028	191899	10.93%	140568	21340	15.18%	109667	78.16%	15.31%	2.26%	0.67%	18.24%		
029	173136	0.08%	130030	33994	26.14%	87586	67.36%	26.29%	2.42%	1.31%	30.02%		
030	212492	22.83%	153122	35660	23.29%	106598	69.62%	21.82%	2.75%	0.82%	25.39%		
031	204694	18.32%	148103	17314	11.69%	119626	80.77%	10.37%	2.36%	0.55%	13.28%		
032	151598	-12.37%	116859	11522	9.86%	88178	75.46%	8.99%	2.88%	3.97%	15.84%		
033	158587	-8.33%	116259	42842	36.85%	51012	43.88%	38.30%	5.26%	1.53%	45.09%		
034	160881	-7.00%	115085	75542	65.64%	27419	23.82%	65.89%	3.20%	2.29%	71.38%		
035	214483	23.98%	152659	110519	72.40%	31056	20.34%	72.82%	2.21%	0.87%	75.90%		
036	145158	-16.09%	117776	60646	51.49%	45548	38.67%	51.99%	2.57%	2.41%	56.97%		
037	192546	11.30%	140657	23916	17.00%	100422	71.39%	15.00%	3.75%	3.05%	21.80%		
038	145163	-16.09%	108443	63546	58.60%	36308	33.48%	61.94%	1.27%	0.83%	64.04%		
039	146037	-15.58%	122766	60282	49.10%	48988	39.90%	50.12%	3.27%	2.75%	56.14%		
040	153070	-11.52%	119014	15664	13.16%	69656	58.53%	12.70%	4.00%	6.52%	23.22%		
041	150651	-12.92%	112808	41216	36.54%	46499	41.22%	38.29%	4.15%	6.40%	48.84%		
042	147006	-15.02%	118734	33805	28.47%	64015	53.91%	31.12%	3.20%	3.15%	37.47%		
043	177093	2.37%	127999	95437	74.56%	25236	19.72%	73.24%	1.56%	0.83%	75.63%		
044	170216	-1.61%	122115	67541	55.31%	29482	24.14%	57.21%	5.31%	5.21%	67.73%		
045	256939	48.52%	178613	27938	15.64%	112602	63.04%	14.98%	5.30%	6.28%	26.56%		
046	181993	5.20%	141820	27119	19.12%	100341	70.75%	20.14%	2.21%	1.92%	24.27%		
047	193917	12.09%	143996	17787	12.35%	114361	79.42%	11.59%	2.34%	1.44%	15.37%		
048	198933	14.99%	141413	17034	12.05%	81921	57.93%	13.00%	3.98%	11.47%	28.45%		
049	190699	10.23%	137589	10015	7.28%	96620	70.22%	7.91%	6.34%	1.34%	15.59%		
050	164656	-4.82%	127509	8870	6.96%	110345	86.54%	7.06%	1.44%	0.59%	9.09%		
051	190842	10.32%	149612	1387	0.93%	140803	94.11%	0.76%	1.39%	0.23%	2.38%		
052	168885	-2.38%	125503	12854	10.24%	100230	79.86%	10.45%	2.42%	0.85%	13.72%		
053	164710	-4.79%	125890	5810	4.62%	115710	91.91%	4.47%	1.11%	0.39%	5.97%		
054	173407	0.24%	125160	3705	2.96%	97125	77.60%	3.28%	6.62%	0.53%	10.43%		
055	158179	-8.56%	113993	81541	71.53%	22515	19.75%	71.4%	2.27%	2.21%	75.91%		
056	160,877	-7.00%	120,580	19454	16.13%	80,045	66.38%	14.04%	3.40%	3.23%	20.67%		

**CVAP Source:**

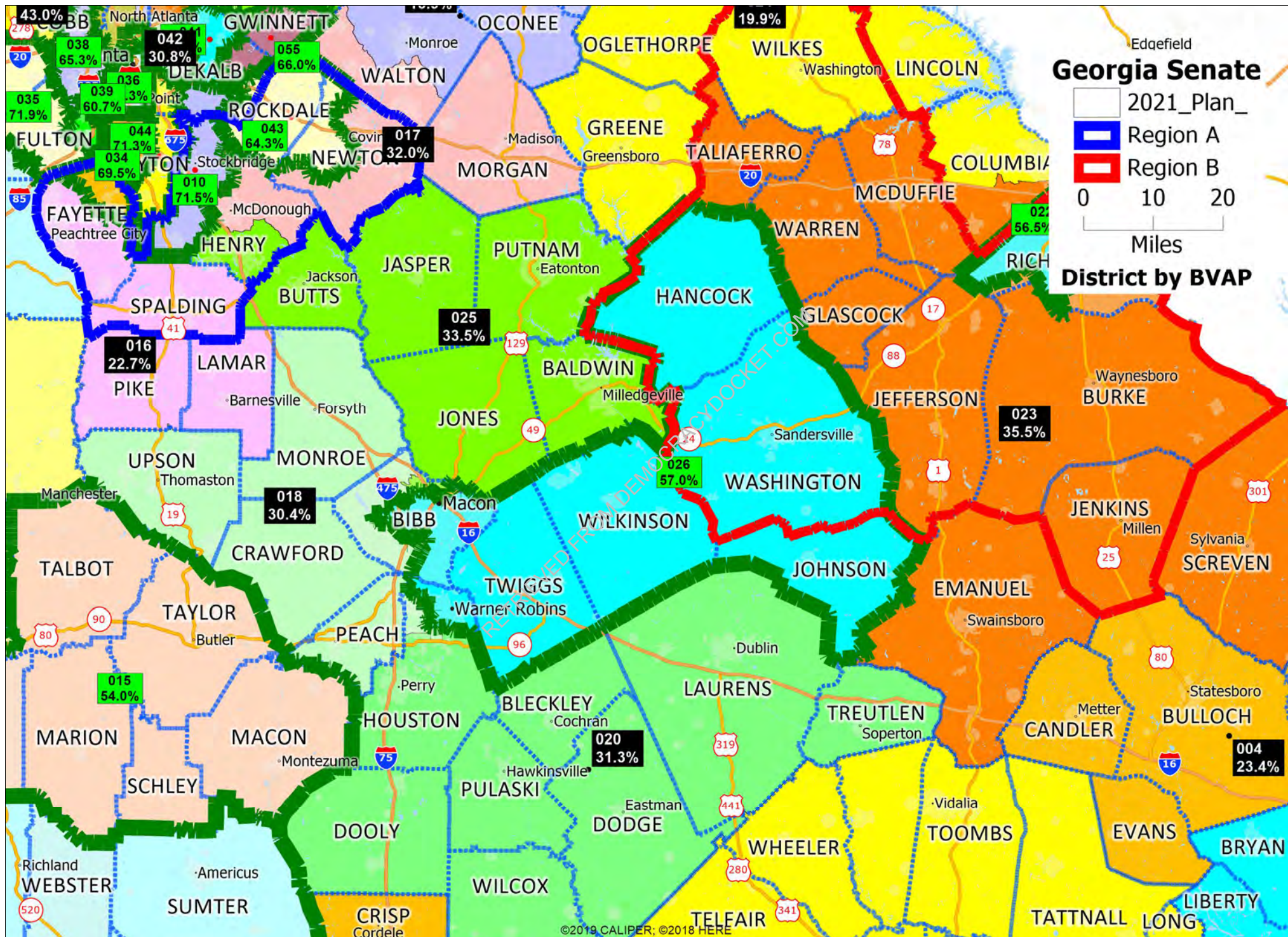
\* 2006-10 ACS Special Tabulation

Note: Citizen Voting Age Population (CVAP) percentages are disaggregated from block-group level ACS estimates (with a survey midpoint of July 2017)

# EXHIBIT K

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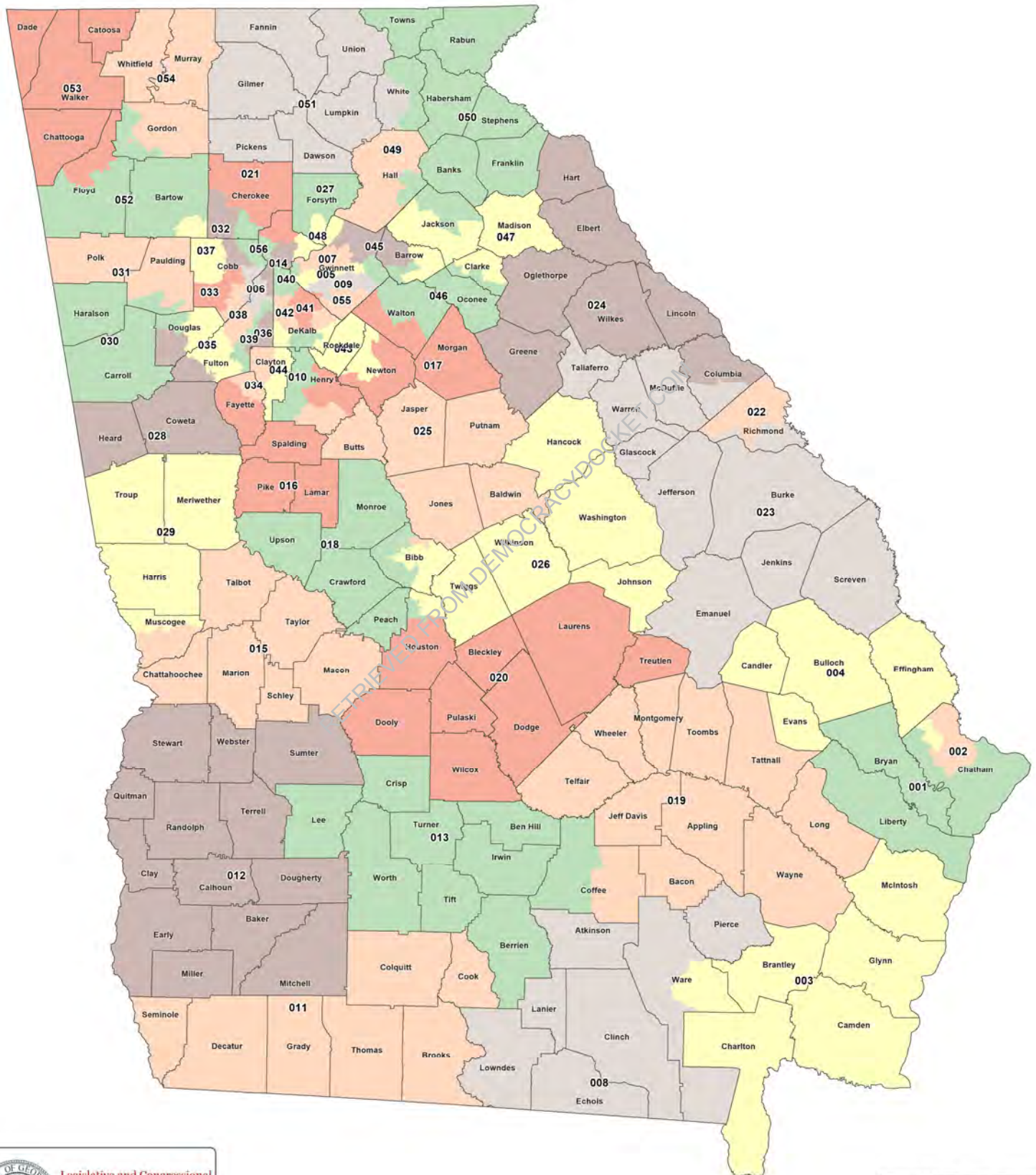


# EXHIBIT L

RETRIEVED FROM DEMOCRACYDOCKET.COM



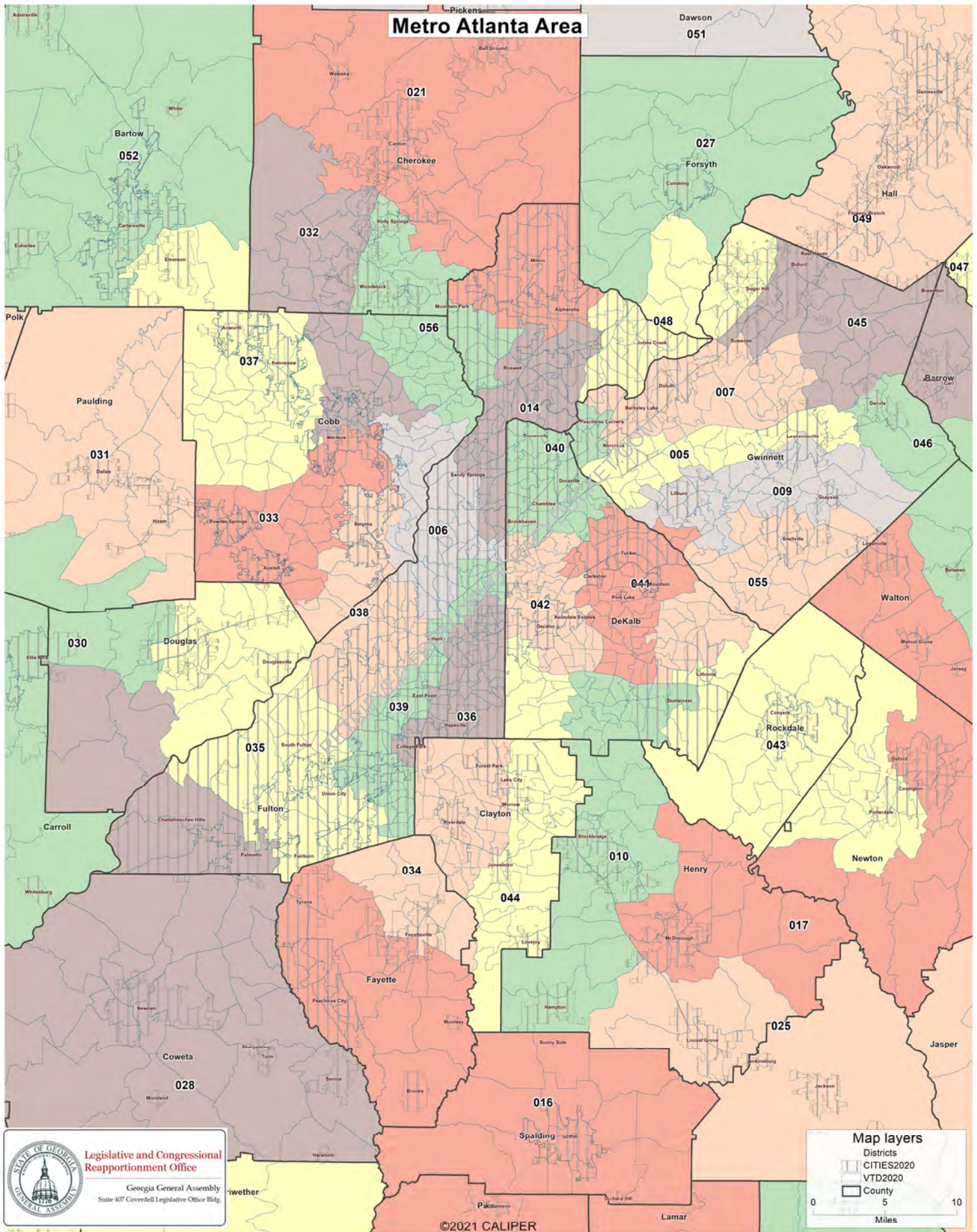
# Proposed Georgia Senate Districts





# Proposed Georgia Senate Districts

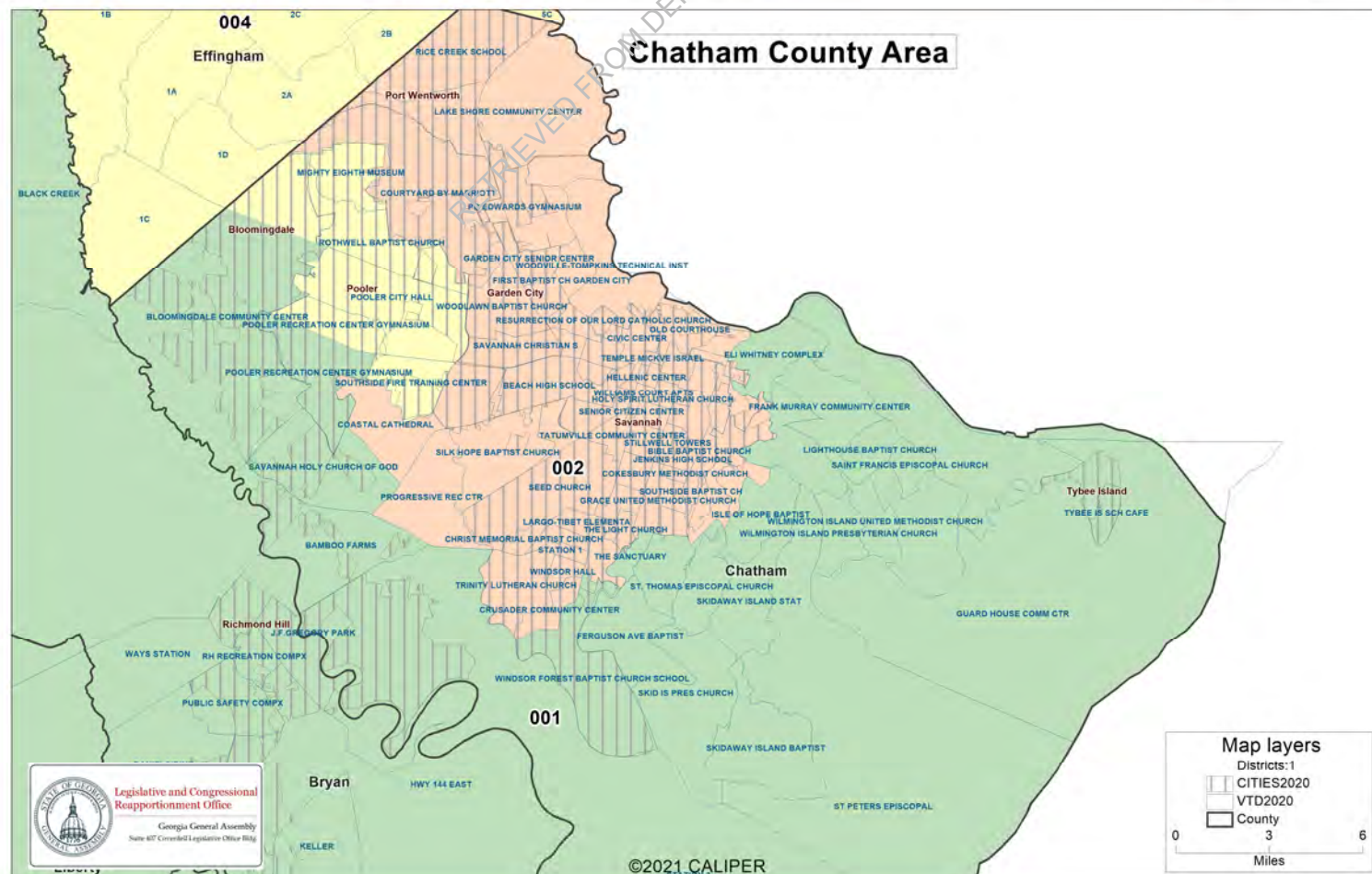
Client: S018  
Plan: Senate-prop1-2021  
Type: Senate



**Legislative and Congressional Reapportionment Office**

Georgia General Assembly  
Suite 407 Coverdell Legislative Office Bldg.

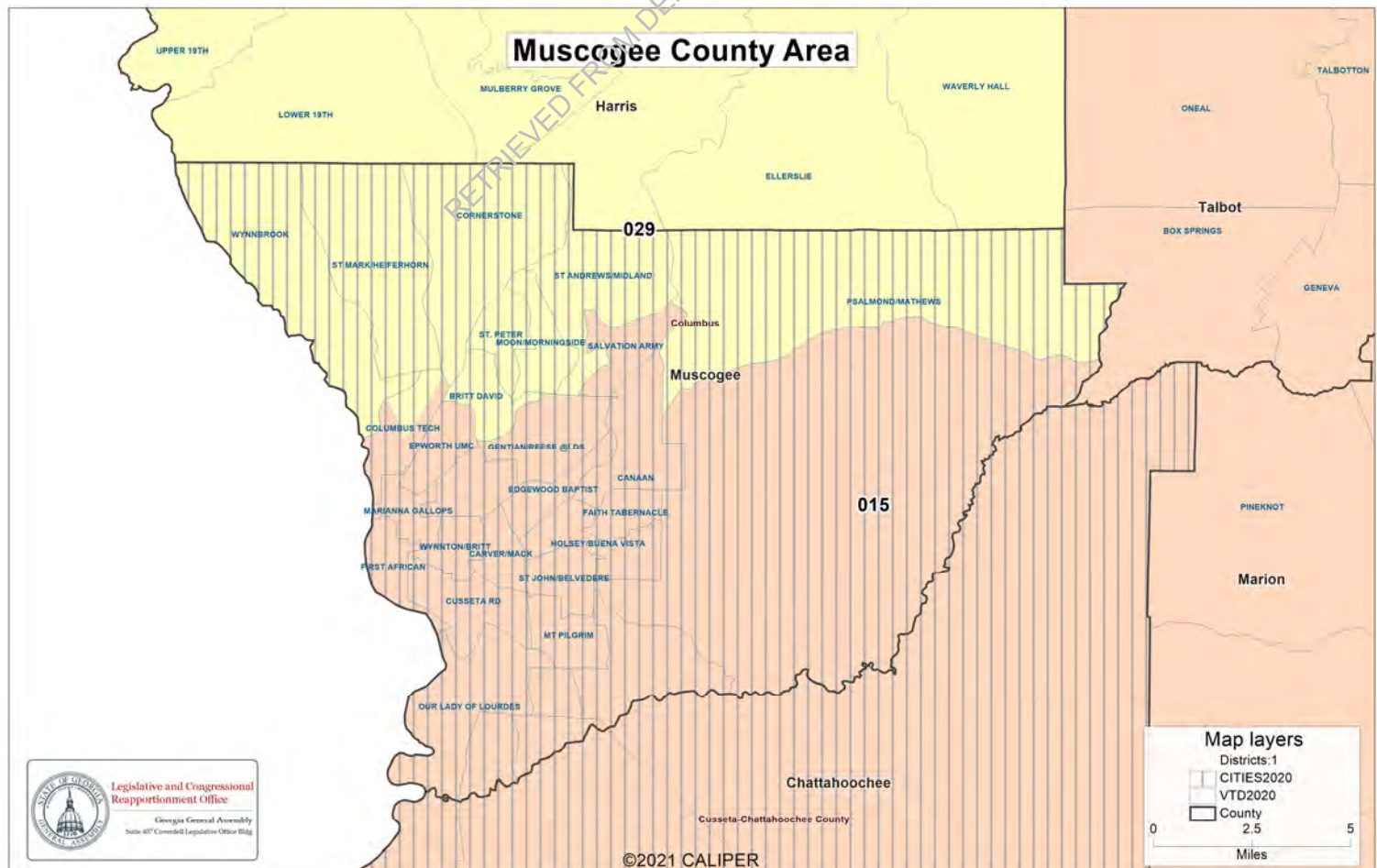
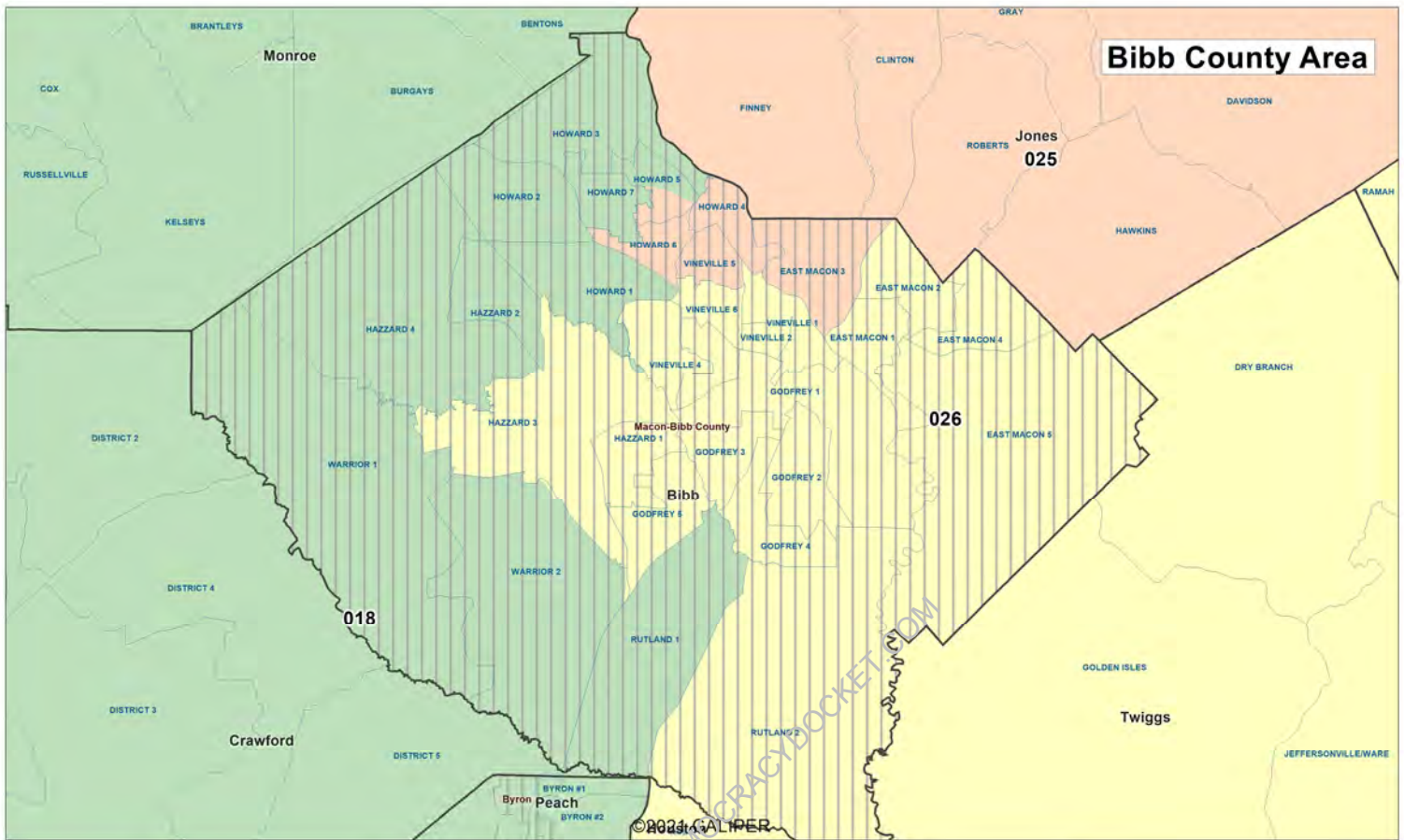






# Proposed Georgia Senate Districts

Client: S018  
Plan: Senate-prop1-2021  
Type: Senate



User: S018

Plan Name: Senate-prop1-2021

Plan Type: Senate

## Population Summary

### Summary Statistics:

Population Range:	189,320 to 193,163
Ratio Range:	0.02
Absolute Range:	-1,964 to 1,879
Absolute Overall Range:	3,843
Relative Range:	-1.03% to 0.98%
Relative Overall Range:	2.01%
Absolute Mean Deviation:	1,012.61
Relative Mean Deviation:	0.53%
Standard Deviation:	1,154.96

District	Population	Deviation	% Devn.	[18+ _Pop]	[% 18+ _Pop]	[% NH_Wht]	[% NH_Blkl]	[% Hispanic Origin]	[% NH_Asn]	[% NH_Ind]	[% NH_Hwn]	[% NH_Oth]	[% NH_2+ Races]
001	191,402	118	0.06%	145,428	75.98%	58.9%	23.66%	8.78%	2.64%	0.25%	0.3%	0.48%	4.99%
002	190,408	-876	-0.46%	150,843	79.22%	36.4%	47.51%	8.36%	3.4%	0.21%	0.15%	0.46%	3.49%
003	191,212	-72	-0.04%	148,915	77.88%	66.23%	20.92%	6.82%	1.22%	0.26%	0.09%	0.42%	4.04%
004	191,098	-186	-0.10%	146,443	76.63%	64.48%	22.6%	6.49%	1.86%	0.23%	0.07%	0.38%	3.9%
005	191,921	637	0.33%	139,394	72.63%	13.35%	25.34%	45.47%	10.98%	0.15%	0.04%	0.64%	2.52%
006	191,401	117	0.06%	155,781	81.39%	56.41%	21.47%	9.18%	7.21%	0.16%	0.03%	1.11%	4.42%
007	189,709	-1,575	-0.82%	147,425	77.71%	35.09%	20.08%	18.57%	21.67%	0.16%	0.04%	0.66%	3.72%
008	192,396	1,112	0.58%	145,144	75.44%	57.39%	30.03%	7.28%	1.21%	0.28%	0.07%	0.35%	3.4%
009	192,915	1,631	0.85%	142,054	73.64%	32.04%	28.46%	21.09%	13.98%	0.18%	0.03%	0.72%	3.48%
010	192,898	1,614	0.84%	147,884	76.66%	17.71%	68.95%	6.03%	3.1%	0.18%	0.03%	0.66%	3.34%
011	189,976	-1,308	-0.68%	144,597	76.11%	55.75%	31.13%	9.36%	0.69%	0.23%	0.03%	0.26%	2.54%
012	190,819	-465	-0.24%	149,154	78.17%	33.83%	58.82%	3.89%	0.86%	0.16%	0.02%	0.21%	2.2%
013	189,326	-1,958	-1.02%	144,141	76.13%	61.25%	27.08%	7.2%	1.2%	0.17%	0.02%	0.26%	2.81%
014	192,533	1,249	0.65%	155,340	80.68%	54.63%	16.79%	13.97%	9.46%	0.13%	0.04%	0.79%	4.19%
015	189,446	-1,838	-0.96%	144,506	76.28%	34.07%	52.31%	7.57%	1.31%	0.23%	0.27%	0.44%	3.79%
016	191,829	545	0.28%	147,133	76.7%	64.19%	22.31%	5.95%	3.04%	0.17%	0.03%	0.51%	3.79%
017	192,510	1,226	0.64%	144,472	75.05%	56.69%	31.21%	6.08%	1.41%	0.16%	0.05%	0.59%	3.81%
018	191,825	541	0.28%	150,196	78.3%	58.41%	30.01%	5.18%	2.42%	0.22%	0.03%	0.4%	3.33%
019	192,316	1,032	0.54%	146,131	75.98%	61.67%	24.76%	9.72%	0.58%	0.17%	0.06%	0.27%	2.77%
020	192,588	1,304	0.68%	147,033	76.35%	59.74%	30.65%	4.21%	1.73%	0.15%	0.05%	0.31%	3.16%
021	192,572	1,288	0.67%	145,120	75.36%	71.13%	6.52%	10.13%	7.38%	0.19%	0.04%	0.53%	4.08%
022	193,163	1,879	0.98%	150,450	77.89%	31.1%	56.58%	5.63%	1.97%	0.24%	0.18%	0.44%	3.86%
023	190,344	-940	-0.49%	144,113	75.71%	54.27%	34.66%	5.46%	1.16%	0.24%	0.1%	0.34%	3.78%
024	192,674	1,390	0.73%	148,602	77.13%	67.45%	18.98%	5.4%	3.31%	0.18%	0.09%	0.43%	4.15%
025	191,161	-123	-0.06%	148,917	77.9%	57.45%	33.4%	4.27%	1.08%	0.16%	0.05%	0.43%	3.16%
026	189,945	-1,339	-0.70%	145,744	76.73%	33.26%	57.37%	4.85%	0.83%	0.21%	0.04%	0.31%	3.14%
027	190,676	-608	-0.32%	139,196	73%	68%	4.31%	11.61%	11.41%	0.18%	0.04%	0.52%	3.94%
028	190,422	-862	-0.45%	144,973	76.13%	67.06%	18.79%	7.4%	1.96%	0.22%	0.04%	0.48%	4.06%
029	189,424	-1,860	-0.97%	145,674	76.9%	60.71%	26.22%	5.34%	3.02%	0.23%	0.1%	0.42%	3.97%

## Population Summary

Senate-prop1-2021

District	Population	Deviation	% Devn.	[18+_Pop]	[% 18+_Pop]	[% NH_Wht]	[% NH_Blkl]	[% Hispanic Origin]	[% NH_Asn]	[% NH_Ind]	[% NH_Hwn]	[% NH_Oth]	[% NH_2+ Races]
030	191,475	191	0.10%	145,077	75.77%	66.97%	19.83%	7.27%	0.95%	0.23%	0.03%	0.49%	4.24%
031	192,560	1,276	0.67%	142,251	73.87%	65.2%	19.83%	8.85%	1.07%	0.23%	0.06%	0.58%	4.19%
032	192,448	1,164	0.61%	149,879	77.88%	63.13%	13.22%	12.09%	5.49%	0.2%	0.04%	0.91%	4.91%
033	192,694	1,410	0.74%	146,415	75.98%	26%	40.48%	26.72%	2.13%	0.19%	0.05%	0.86%	3.56%
034	190,668	-616	-0.32%	141,840	74.39%	11.11%	66.6%	14.82%	3.9%	0.23%	0.04%	0.6%	2.7%
035	192,839	1,555	0.81%	144,675	75.02%	16.46%	69.77%	8.68%	1.13%	0.17%	0.06%	0.64%	3.08%
036	192,282	998	0.52%	161,385	83.93%	33.1%	51.35%	7.56%	3.58%	0.17%	0.04%	0.53%	3.68%
037	192,671	1,387	0.73%	147,779	76.7%	62.38%	18.04%	9.99%	3.85%	0.16%	0.03%	0.78%	4.76%
038	193,155	1,871	0.98%	148,367	76.81%	20.03%	62.74%	9.72%	3.42%	0.18%	0.04%	0.58%	3.29%
039	191,500	216	0.11%	156,022	81.47%	25.32%	60.33%	6.1%	4.25%	0.16%	0.04%	0.57%	3.22%
040	190,544	-740	-0.39%	147,000	77.15%	43.69%	16.42%	24.81%	10.84%	0.12%	0.04%	0.65%	3.43%
041	191,023	-261	-0.14%	145,278	76.05%	18.86%	60.28%	7.32%	9.19%	0.22%	0.02%	0.64%	3.48%
042	190,940	-344	-0.18%	153,952	80.63%	49.91%	28.14%	10.13%	6.81%	0.13%	0.03%	0.61%	4.24%
043	192,729	1,445	0.76%	145,741	75.62%	23.45%	62.77%	8.13%	1.24%	0.17%	0.09%	0.67%	3.49%
044	190,036	-1,248	-0.65%	145,224	76.42%	13.02%	69.13%	9.96%	4.15%	0.16%	0.04%	0.62%	2.91%
045	190,692	-592	-0.31%	140,706	73.79%	52.74%	17.12%	14.66%	10.69%	0.13%	0.03%	0.62%	4.01%
046	190,312	-972	-0.51%	146,713	77.09%	67.24%	16.64%	7.99%	3.77%	0.2%	0.03%	0.58%	3.56%
047	190,607	-677	-0.35%	146,599	76.91%	64.67%	16.96%	11.22%	2.66%	0.16%	0.04%	0.58%	3.71%
048	190,123	-1,161	-0.61%	136,995	72.06%	49.01%	8.35%	7.58%	30.59%	0.13%	0.04%	0.55%	3.75%
049	189,355	-1,929	-1.01%	144,123	76.11%	60.85%	7.13%	26.24%	2.15%	0.15%	0.04%	0.35%	3.08%
050	189,320	-1,964	-1.03%	148,799	78.6%	78.61%	5.05%	11.08%	1.22%	0.22%	0.04%	0.26%	3.52%
051	190,167	-1,117	-0.58%	155,571	81.81%	88.75%	0.84%	5.43%	0.59%	0.31%	0.02%	0.3%	3.77%
052	190,799	-485	-0.25%	146,620	76.85%	71.8%	12.39%	10.11%	1.08%	0.21%	0.03%	0.35%	4.02%
053	190,236	-1,048	-0.55%	148,201	77.9%	85.78%	4.46%	3.98%	1%	0.24%	0.06%	0.3%	4.18%
054	192,443	1,159	0.61%	143,843	74.75%	65.71%	2.97%	26.66%	1.14%	0.19%	0.02%	0.25%	3.07%
055	190,155	-1,129	-0.59%	141,968	74.66%	18.09%	62.96%	10.14%	4.19%	0.17%	0.04%	0.73%	3.67%
056	191,226	-58	-0.03%	144,448	75.54%	73.9%	6.36%	8.63%	5.67%	0.11%	0.03%	0.75%	4.56%

Total: 10,711,908

Ideal District: 191,284



User: S018

Plan Name: Senate-prop1-2021

Plan Type: Senate

## Population Summary

### Summary Statistics:

Population Range:	189,320 to 193,163
Ratio Range:	0.02
Absolute Range:	-1,964 to 1,879
Absolute Overall Range:	3,843
Relative Range:	-1.03% to 0.98%
Relative Overall Range:	2.01%
Absolute Mean Deviation:	1,012.61
Relative Mean Deviation:	0.53%
Standard Deviation:	1,154.96

District	Population	Deviation	% Devn.	[18+_Pop]	[% 18+_Pop]	[% NH18+_Wht]	[% NH18+_Blk]	[% H18+_Pop]	[% NH18+_Asn]	[% NH18+_Ind]	[% NH18+_Hwn]	[% NH18+_Oth]	[% NH18+_2+ Races]
001	191,402	118	0.06%	145,428	75.98%	61.99%	22.8%	7.55%	2.81%	0.28%	0.27%	0.4%	3.9%
002	190,408	-876	-0.46%	150,843	79.22%	40.21%	44.81%	7.48%	3.77%	0.22%	0.15%	0.42%	2.95%
003	191,212	-72	-0.04%	148,915	77.88%	68.88%	19.81%	6.17%	1.27%	0.27%	0.08%	0.34%	3.19%
004	191,098	-186	-0.10%	146,443	76.63%	66.78%	21.98%	5.52%	1.9%	0.24%	0.07%	0.33%	3.17%
005	191,921	637	0.33%	139,394	72.63%	15.69%	27.21%	41.67%	12.41%	0.14%	0.04%	0.55%	2.28%
006	191,401	117	0.06%	155,781	81.39%	57.79%	21.79%	8.24%	7.14%	0.16%	0.03%	1.05%	3.8%
007	189,709	-1,575	-0.82%	147,425	77.71%	37.84%	19.33%	16.56%	22.58%	0.16%	0.05%	0.55%	2.93%
008	192,396	1,112	0.58%	145,144	75.44%	60.1%	29.02%	6.21%	1.27%	0.29%	0.08%	0.27%	2.75%
009	192,915	1,631	0.85%	142,054	73.64%	35.81%	27.23%	18.77%	14.59%	0.18%	0.04%	0.59%	2.8%
010	192,898	1,614	0.84%	147,884	76.66%	19.64%	68.31%	5.18%	3.15%	0.18%	0.04%	0.61%	2.89%
011	189,976	-1,308	-0.68%	144,597	76.11%	58.97%	30.08%	7.6%	0.72%	0.26%	0.02%	0.22%	2.13%
012	190,819	-465	-0.24%	149,154	78.17%	36.71%	56.63%	3.48%	0.92%	0.18%	0.02%	0.18%	1.88%
013	189,326	-1,958	-1.02%	144,141	76.13%	64.1%	26.01%	6.01%	1.21%	0.17%	0.02%	0.21%	2.26%
014	192,533	1,249	0.65%	155,340	80.68%	57.1%	16.83%	12.13%	9.43%	0.12%	0.05%	0.74%	3.61%
015	189,446	-1,838	-0.96%	144,506	76.28%	36.52%	51.56%	6.59%	1.45%	0.23%	0.25%	0.36%	3.04%
016	191,829	545	0.28%	147,133	76.7%	66.91%	21.49%	5.03%	2.92%	0.18%	0.03%	0.42%	3.01%
017	192,510	1,226	0.64%	144,472	75.05%	59.42%	30.21%	5.13%	1.41%	0.17%	0.03%	0.49%	3.14%
018	191,825	541	0.28%	150,196	78.3%	60.69%	29.2%	4.51%	2.46%	0.22%	0.03%	0.29%	2.6%
019	192,316	1,032	0.54%	146,131	75.98%	63.99%	24.52%	8.38%	0.62%	0.18%	0.06%	0.2%	2.06%
020	192,588	1,304	0.68%	147,033	76.35%	61.71%	30.17%	3.49%	1.76%	0.16%	0.05%	0.25%	2.41%
021	192,572	1,288	0.67%	145,120	75.36%	73.87%	6.37%	8.77%	6.98%	0.18%	0.04%	0.48%	3.32%
022	193,163	1,879	0.98%	150,450	77.89%	34.38%	53.94%	5.35%	2.3%	0.24%	0.18%	0.38%	3.24%
023	190,344	-940	-0.49%	144,113	75.71%	56.89%	33.91%	4.52%	1.24%	0.25%	0.09%	0.27%	2.84%
024	192,674	1,390	0.73%	148,602	77.13%	69.81%	18.69%	4.4%	3.27%	0.2%	0.07%	0.35%	3.2%
025	191,161	-123	-0.06%	148,917	77.9%	59.94%	32.23%	3.66%	1.09%	0.18%	0.04%	0.39%	2.48%
026	189,945	-1,339	-0.70%	145,744	76.73%	36.6%	55.18%	4.24%	0.92%	0.22%	0.03%	0.24%	2.56%
027	190,676	-608	-0.32%	139,196	73%	71.5%	4.16%	10.2%	10.27%	0.15%	0.04%	0.45%	3.22%
028	190,422	-862	-0.45%	144,973	76.13%	69.44%	18.18%	6.44%	1.99%	0.23%	0.04%	0.38%	3.29%

## Population Summary

Senate-prop1-2021

District	Population	Deviation	% Devn.	[18+_Pop]	[% 18+_Pop]	[% NH18+_Wht]	[% NH18+_Blk]	[% H18+_Pop]	[% NH18+_Asn]	[% NH18+_Ind]	[% NH18+_Hwn ]	[% NH18+_Oth]	[% NH18+_2+ Races]
029	189,424	-1,860	-0.97%	145,674	76.9%	63.22%	25.52%	4.45%	3%	0.23%	0.11%	0.33%	3.13%
030	191,475	191	0.10%	145,077	75.77%	69.41%	19.44%	6.1%	0.97%	0.24%	0.03%	0.41%	3.4%
031	192,560	1,276	0.67%	142,251	73.87%	68.26%	19.13%	7.42%	1.12%	0.22%	0.06%	0.46%	3.33%
032	192,448	1,164	0.61%	149,879	77.88%	65.78%	13.13%	10.55%	5.42%	0.2%	0.04%	0.83%	4.05%
033	192,694	1,410	0.74%	146,415	75.98%	30.25%	40.26%	22.93%	2.35%	0.22%	0.05%	0.81%	3.14%
034	190,668	-616	-0.32%	141,840	74.39%	13.36%	66.5%	12.75%	4.26%	0.22%	0.04%	0.56%	2.31%
035	192,839	1,555	0.81%	144,675	75.02%	18.82%	68.87%	7.51%	1.26%	0.18%	0.06%	0.59%	2.7%
036	192,282	998	0.52%	161,385	83.93%	36.18%	48.68%	7.06%	4.01%	0.17%	0.04%	0.51%	3.34%
037	192,671	1,387	0.73%	147,779	76.7%	65.37%	17.41%	8.69%	3.94%	0.17%	0.04%	0.67%	3.73%
038	193,155	1,871	0.98%	148,367	76.81%	21.87%	62.45%	8.44%	3.55%	0.18%	0.04%	0.56%	2.92%
039	191,500	216	0.11%	156,022	81.47%	27.87%	57.97%	5.65%	4.83%	0.15%	0.04%	0.5%	2.98%
040	190,544	-740	-0.39%	147,000	77.15%	46.34%	17.32%	21.62%	11.15%	0.11%	0.04%	0.59%	2.84%
041	191,023	-261	-0.14%	145,278	76.05%	21.39%	59.67%	6.63%	8.42%	0.22%	0.02%	0.6%	3.01%
042	190,940	-344	-0.18%	153,952	80.63%	51.39%	28.73%	8.64%	7.16%	0.12%	0.03%	0.53%	3.4%
043	192,729	1,445	0.76%	145,741	75.62%	26.53%	61.35%	6.89%	1.34%	0.17%	0.08%	0.6%	3.05%
044	190,036	-1,248	-0.65%	145,224	76.42%	15.29%	68.39%	8.6%	4.37%	0.17%	0.04%	0.56%	2.58%
045	190,692	-592	-0.31%	140,706	73.79%	55.47%	16.86%	13.05%	10.89%	0.13%	0.03%	0.5%	3.07%
046	190,312	-972	-0.51%	146,713	77.09%	69.9%	15.64%	6.99%	3.85%	0.22%	0.02%	0.5%	2.89%
047	190,607	-677	-0.35%	146,599	76.91%	67.46%	16.34%	9.57%	2.79%	0.17%	0.04%	0.5%	3.13%
048	190,123	-1,161	-0.61%	136,995	72.06%	52.25%	8.26%	7%	29.05%	0.11%	0.04%	0.47%	2.83%
049	189,355	-1,929	-1.01%	144,123	76.11%	65.64%	7.12%	21.9%	2.22%	0.16%	0.04%	0.29%	2.63%
050	189,320	-1,964	-1.03%	148,799	78.6%	81.54%	5.03%	8.78%	1.24%	0.24%	0.03%	0.24%	2.91%
051	190,167	-1,117	-0.58%	155,571	81.81%	90.24%	0.84%	4.34%	0.61%	0.33%	0.02%	0.27%	3.34%
052	190,799	-485	-0.25%	146,620	76.85%	74.74%	12.08%	8.24%	1.13%	0.22%	0.02%	0.29%	3.27%
053	190,236	-1,048	-0.55%	148,201	77.9%	87.31%	4.49%	3.23%	0.99%	0.26%	0.06%	0.22%	3.44%
054	192,443	1,159	0.61%	143,843	74.75%	69.98%	3.07%	22.64%	1.15%	0.22%	0.02%	0.21%	2.71%
055	190,155	-1,129	-0.59%	141,968	74.65%	20.56%	62.42%	8.71%	4.24%	0.18%	0.04%	0.67%	3.18%
056	191,226	-58	-0.03%	144,448	75.54%	76.17%	6.37%	7.66%	5.51%	0.12%	0.03%	0.63%	3.51%

Total: 10,711,908

Ideal District: 191,284

# EXHIBIT M

RETRIEVED FROM DEMOCRACYDOCKET.COM

## Population Summary Report

## Georgia State Senate --2021 Plan

District	2020 Pop.	% 2020		18+ AP	18+ AP	18+ NH	% 18+ NH	2015-19	2015-19	2015-19	2015-19	2015-19	Incumbents
		Deviation	18+ Pop		Black						B+L+A	NH White	
					Black	White	White	BCVAP*	LCVAP*	ACVAP*	CVAP*	CVAP*	
001	191402	0.06%	145428	36468	25.08%	90150	61.99%	24.12%	6.38%	2.49%	32.99%	65.83%	1
002	190408	-0.46%	150843	70688	46.86%	60650	40.21%	53.13%	4.28%	1.47%	58.88%	40.30%	1
003	191212	-0.04%	148915	31545	21.18%	102574	68.88%	22.87%	3.13%	1.35%	27.35%	71.91%	1
004	191098	-0.10%	146443	34217	23.37%	97792	66.78%	23.64%	2.86%	1.06%	27.56%	71.51%	1
005	191921	0.33%	139394	41736	29.94%	21872	15.69%	38.70%	19.93%	13.74%	72.36%	26.30%	1
006	191401	0.06%	155781	37231	23.90%	90024	57.79%	23.06%	4.63%	4.76%	32.45%	66.92%	1
007	189709	-0.82%	147425	31601	21.44%	55780	37.84%	23.42%	8.40%	16.90%	48.73%	50.46%	1
008	192396	0.58%	145144	44098	30.38%	87232	60.10%	30.18%	4.19%	1.10%	35.46%	63.55%	1
009	192915	0.85%	142054	41948	29.53%	50868	35.81%	30.19%	9.36%	11.34%	50.89%	48.30%	1
010	192898	0.84%	147884	105671	71.46%	29039	19.64%	68.86%	3.80%	2.73%	75.38%	23.77%	1
011	189976	-0.68%	144597	44887	31.04%	85275	58.97%	32.41%	3.43%	0.47%	36.32%	62.84%	1
012	190819	-0.24%	149154	86465	57.97%	54752	36.71%	59.25%	1.33%	0.70%	61.28%	38.13%	1
013	189326	-1.02%	144141	38871	26.97%	92398	64.10%	27.49%	3.21%	0.97%	31.67%	67.81%	1
014	192533	0.65%	155340	29470	18.97%	88706	57.10%	19.75%	5.98%	6.16%	31.90%	67.30%	1
015	189446	-0.96%	144506	78040	54.00%	52771	36.52%	53.56%	5.59%	1.33%	60.48%	38.55%	1
016	191829	0.28%	147133	33393	22.70%	98454	66.91%	22.24%	3.32%	2.02%	27.58%	71.46%	1
017	192510	0.64%	144472	46245	32.01%	85846	59.42%	27.89%	2.70%	1.18%	31.77%	67.34%	1
018	191825	0.28%	150196	45662	30.40%	91155	60.69%	30.44%	2.50%	1.81%	34.75%	64.62%	1
019	192316	0.54%	146131	37589	25.72%	93506	63.99%	27.82%	4.25%	0.40%	32.47%	66.86%	1
020	192588	0.68%	147033	45991	31.28%	90729	61.71%	31.59%	2.67%	1.09%	35.35%	63.98%	3
021	192572	0.67%	145120	10823	7.46%	107202	73.87%	7.89%	4.72%	3.50%	16.11%	82.97%	1
022	193163	0.98%	150450	85009	56.50%	51728	34.38%	57.93%	4.02%	1.80%	63.76%	35.32%	1
023	190344	-0.49%	144113	51133	35.48%	81988	56.89%	35.06%	3.11%	0.84%	39.01%	60.09%	0
024	192674	0.73%	148602	29503	19.85%	103744	69.81%	21.16%	2.86%	2.56%	26.58%	72.87%	1
025	191161	-0.06%	148917	49860	33.48%	89256	59.94%	32.45%	2.48%	0.95%	35.87%	63.76%	1
026	189945	-0.70%	145744	83056	56.99%	53346	36.60%	56.93%	2.22%	0.82%	59.97%	39.34%	1
027	190676	-0.32%	139196	6961	5.00%	99531	71.50%	4.08%	5.44%	4.87%	14.40%	84.89%	1
028	190422	-0.45%	144973	28282	19.51%	100664	69.44%	18.97%	4.25%	1.35%	24.56%	74.52%	1
029	189424	-0.97%	145674	39150	26.88%	92102	63.22%	27.45%	3.45%	2.13%	33.04%	66.07%	1
030	191475	0.10%	145077	30346	20.92%	100699	69.41%	21.14%	3.12%	0.82%	25.08%	74.15%	1
031	192560	0.67%	142251	29440	20.70%	97094	68.26%	17.68%	4.68%	0.83%	23.19%	75.98%	1
032	192448	0.61%	149879	22274	14.86%	96589	65.78%	13.75%	5.72%	3.72%	23.19%	75.67%	1
033	192694	0.74%	146415	62897	42.96%	44286	30.25%	47.97%	10.51%	2.48%	60.96%	38.28%	0
034	190668	-0.32%	141840	98640	69.54%	18951	13.36%	73.27%	5.16%	3.38%	81.82%	17.07%	1
035	192839	0.81%	144675	104019	71.90%	27234	18.82%	68.27%	4.22%	0.97%	73.46%	25.64%	1
036	192282	0.52%	161385	82859	51.34%	58394	36.18%	53.64%	3.72%	3.02%	60.38%	38.93%	1
037	192671	0.73%	147779	28484	19.27%	96596	65.37%	18.82%	5.46%	3.60%	27.88%	71.43%	1
038	193155	0.98%	148367	96886	65.30%	32445	21.87%	69.99%	4.03%	2.27%	76.28%	23.30%	1
039	191500	0.11%	156022	94702	60.70%	43478	27.87%	63.27%	3.14%	3.27%	69.68%	29.75%	1
040	190544	-0.39%	147000	28277	19.24%	68121	46.34%	22.07%	7.43%	7.88%	37.38%	62.08%	1
041	191023	-0.14%	145278	90961	62.61%	31068	21.39%	66.37%	2.74%	4.22%	73.32%	25.66%	1
042	190940	-0.18%	153952	47383	30.78%	79111	51.39%	35.04%	3.19%	4.94%	43.17%	55.88%	1
043	192729	0.76%	145741	93754	64.33%	38669	26.53%	61.38%	4.11%	1.52%	67.01%	32.37%	1
044	190036	-0.65%	145224	103599	71.34%	22202	15.29%	73.79%	4.90%	3.82%	82.50%	16.56%	1
045	190692	-0.31%	140706	26149	18.58%	78049	55.47%	17.77%	7.97%	7.32%	33.06%	66.11%	0
046	190312	-0.51%	146713	24793	16.90%	102559	69.90%	16.67%	3.96%	3.23%	23.86%	75.50%	1
047	190607	-0.35%	146599	25543	17.42%	98893	67.46%	19.34%	4.51%	1.58%	25.42%	73.97%	1
048	190123	-0.61%	136995	12968	9.47%	71575	52.25%	8.60%	5.77%	16.94%	31.31%	67.93%	1
049	189355	-1.01%	144123	11475	7.96%	94600	65.64%	8.66%	10.81%	1.97%	21.44%	77.80%	1
050	189320	-1.03%	148799	8341	5.61%	121337	81.54%	6.02%	4.73%	1.05%	11.80%	87.16%	1
051	190167	-0.58%	155571	1876	1.21%	140394	90.24%	1.34%	2.21%	0.52%	4.06%	93.72%	1
052	190799	-0.25%	146620	19120	13.04%	109583	74.74%	13.27%	3.93%	0.83%	18.03%	81.15%	1
053	190236	-0.55%	148201	7558	5.10%	129390	87.31%	4.83%	1.74%	0.81%	7.38%	91.71%	1
054	192443	0.61%	143843	5450	3.79%	100668	69.98%	4.07%	11.67%	0.81%	16.55%	82.47%	1
055	190155	-0.59%	141968	93659	65.97%	29183	20.56%	67.72%	4.33%	2.22%	74.27%	24.77%	1
056	191226	-0.03%	144448	10940	7.57%	110031	76.17%	6.99%	4.98%	3.81%	15.79%	83.61%	2
<b>Total 2020</b>													
<b>Pop.</b>	<b>10,711,908</b>	<b>2.01%</b>	<b>8,220,274</b>	<b>2,607,986</b>	<b>31.73%</b>	<b>4,342,333</b>	<b>52.82%</b>						

## Majority Districts

14

15

18

38

## CVAP Source:

\* 2015-19 ACS Special Tabulation

Note: Citizen Voting Age Population (CVAP) percentages are disaggregated from block-group level ACS estimates (with a survey midpoint of July 2017)

Source for disaggregation: Redistricting Data Hub

<https://redistrictingdatahub.org/dataset/georgia-cvap-data-disaggregated-to-the-2020-block-level-2019/>

# **EXHIBIT A**

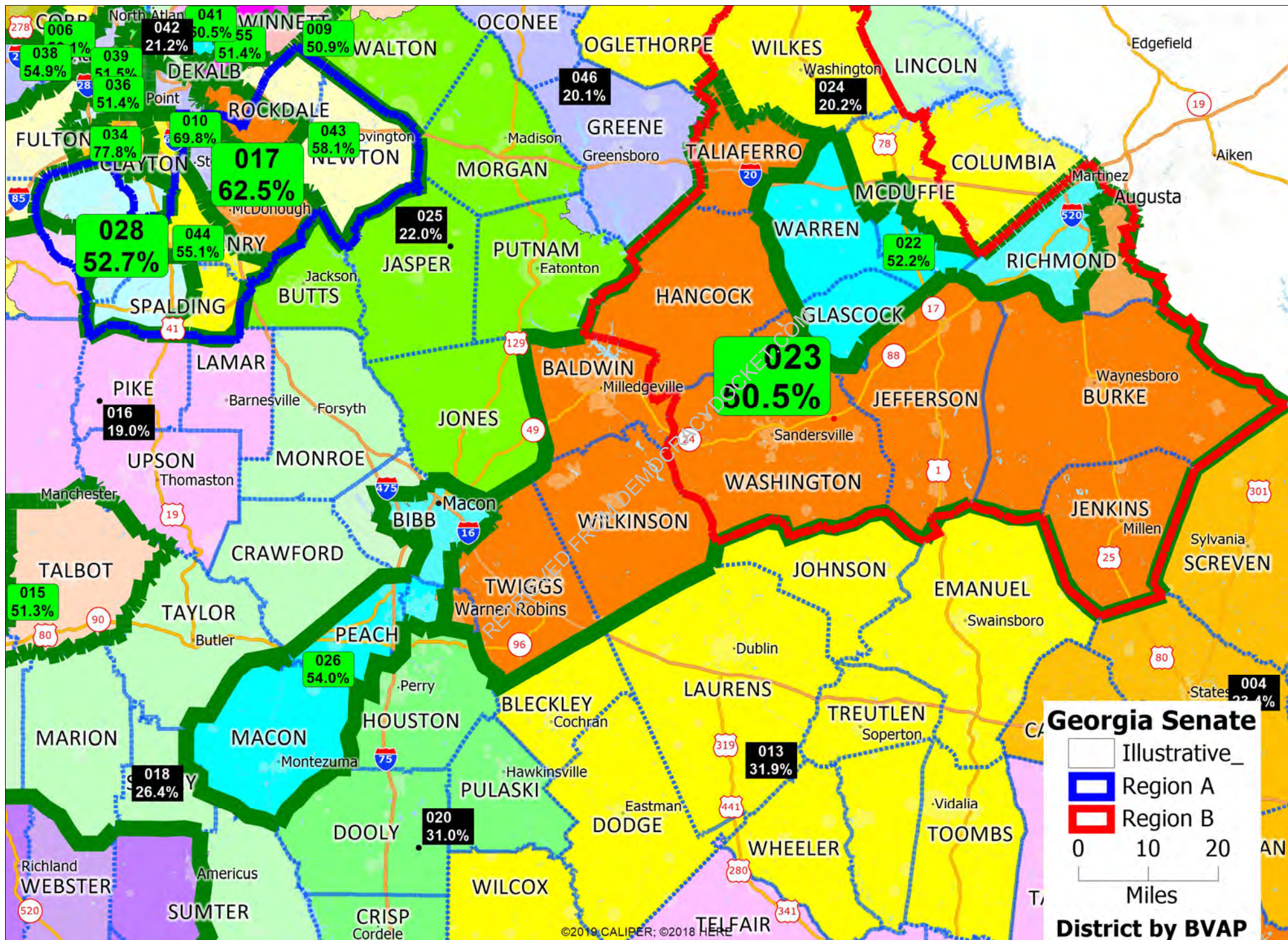
## **Part 2**

RETRIEVED FROM DEMOCRACYDOCKET.COM



# EXHIBIT N-1

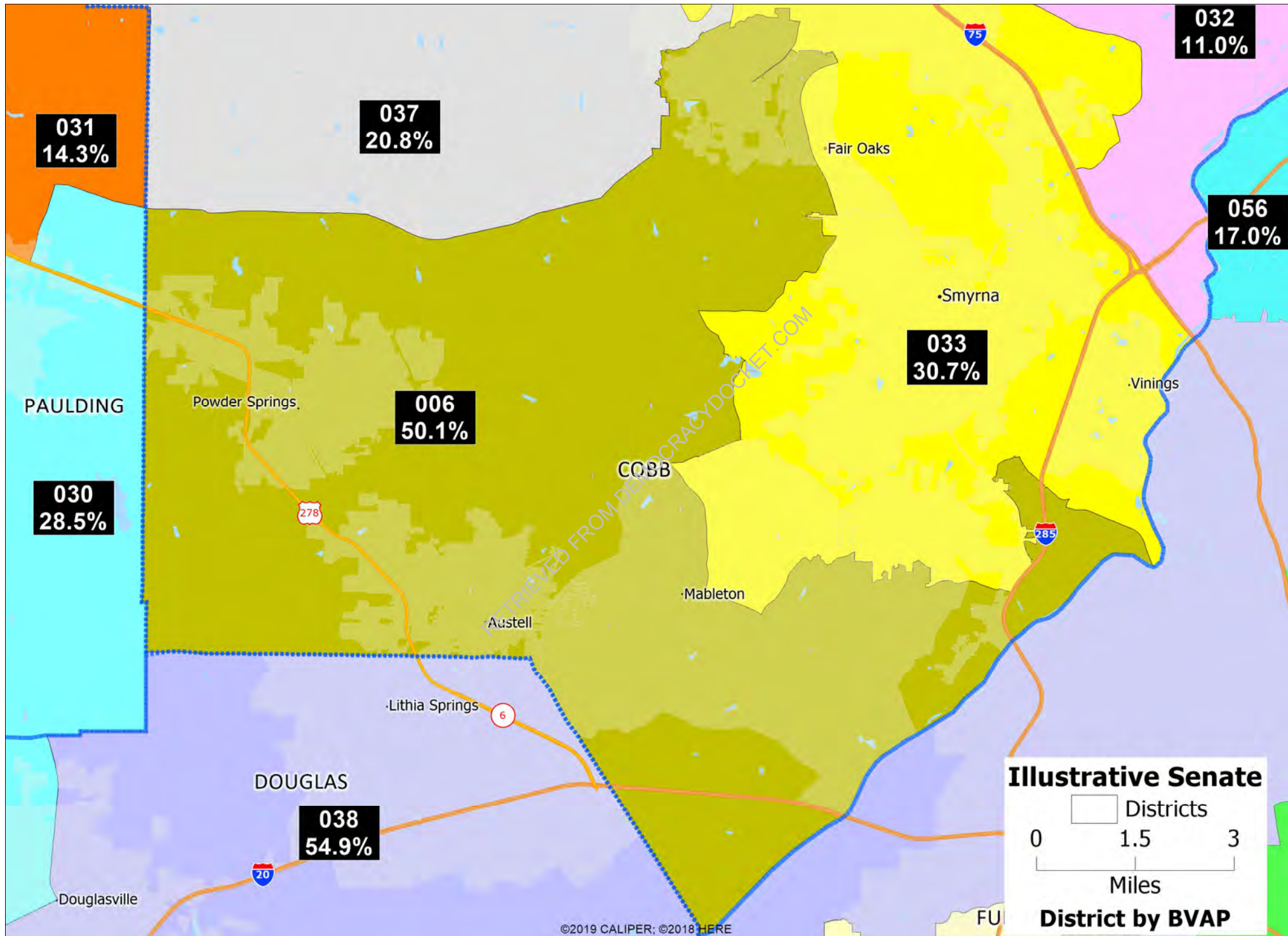
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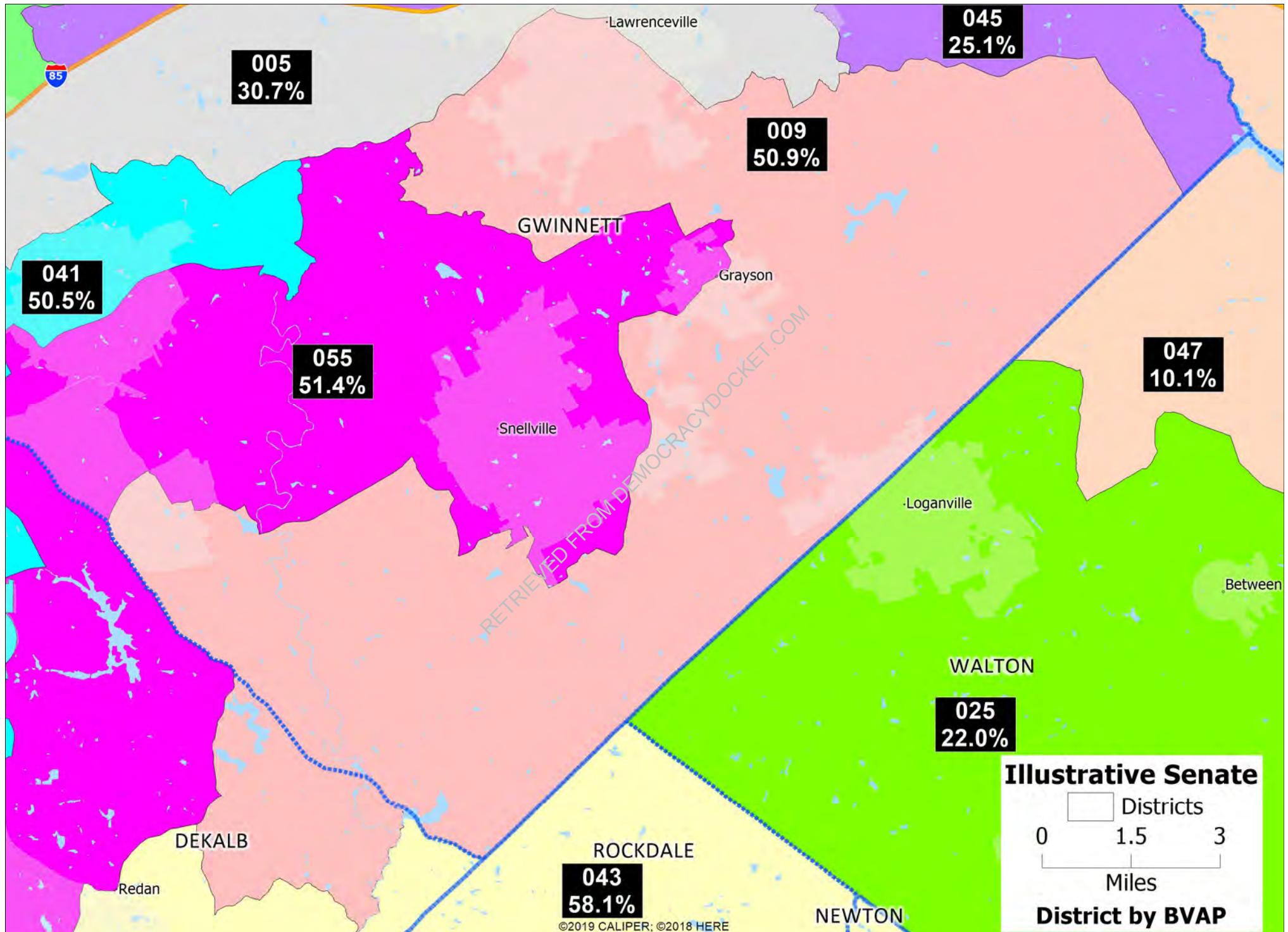


# EXHIBIT N-2

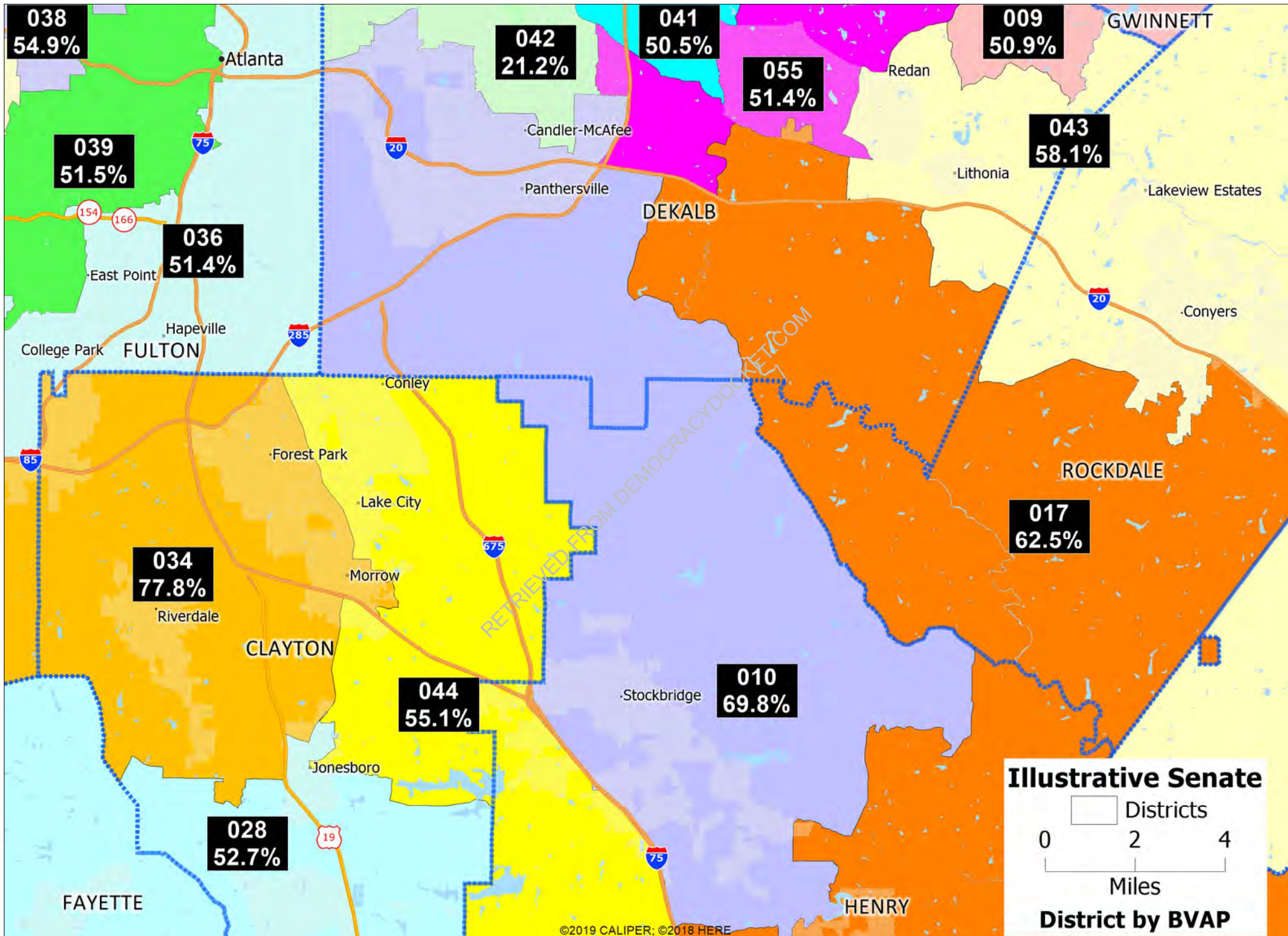
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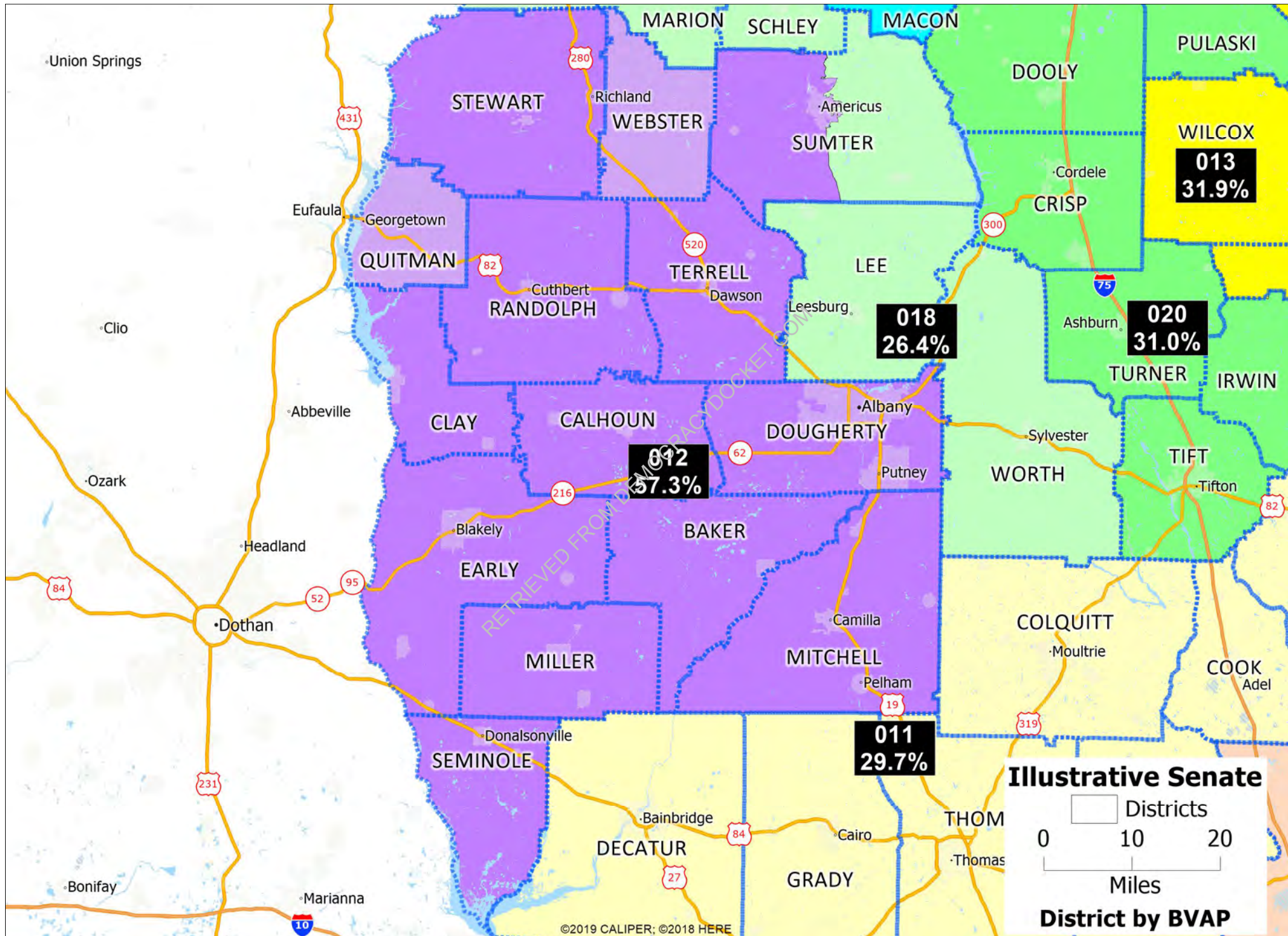




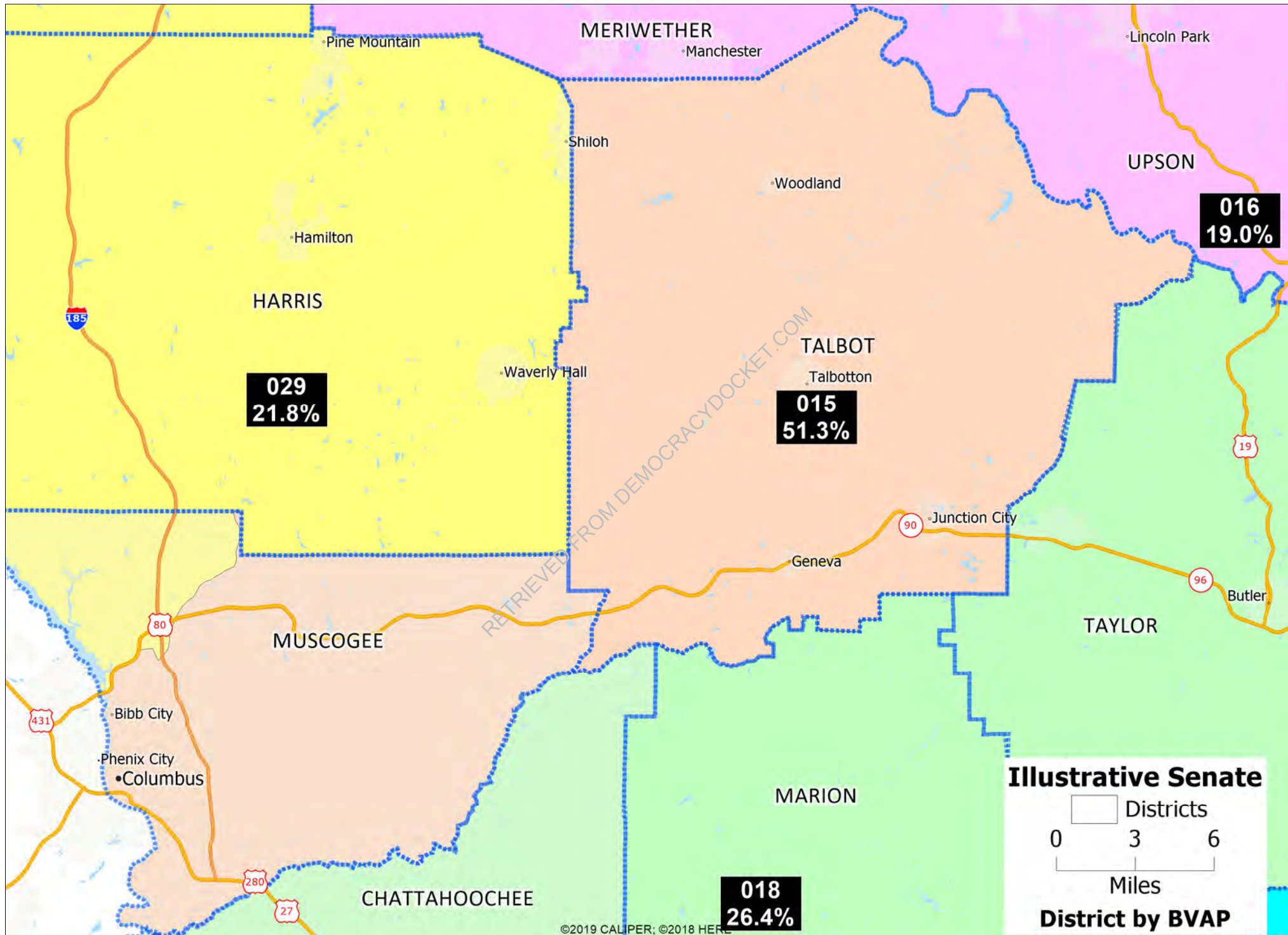




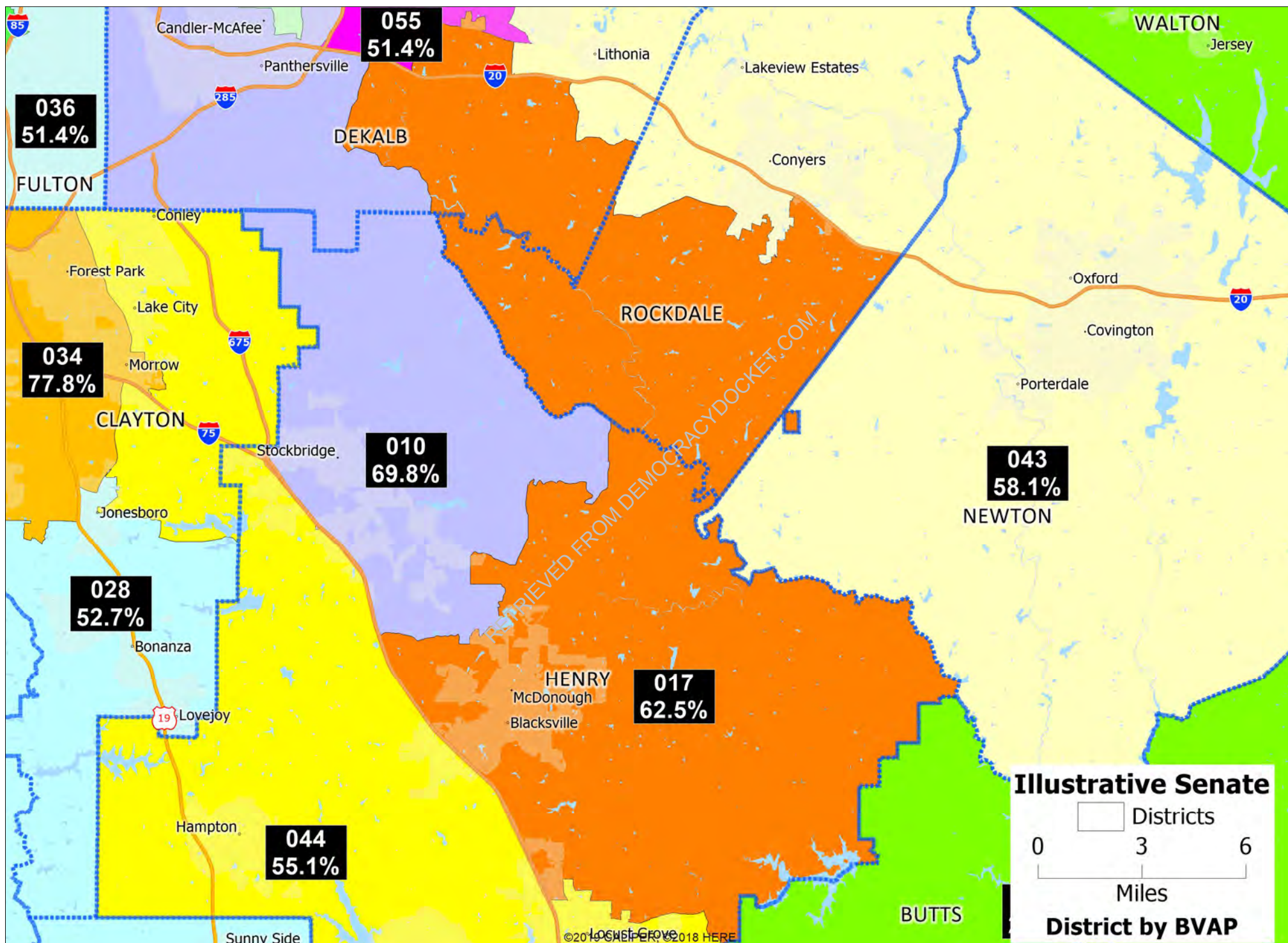




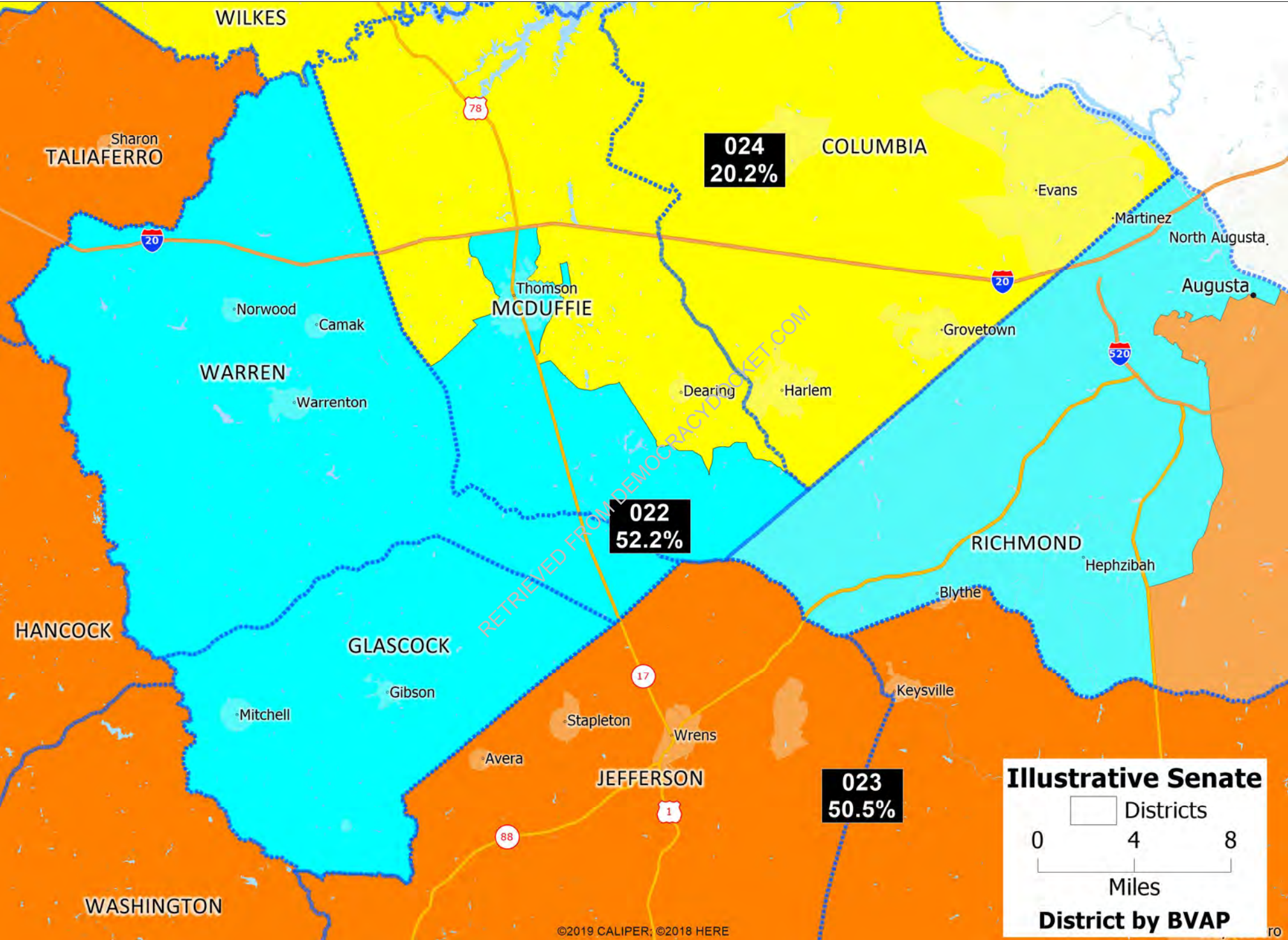




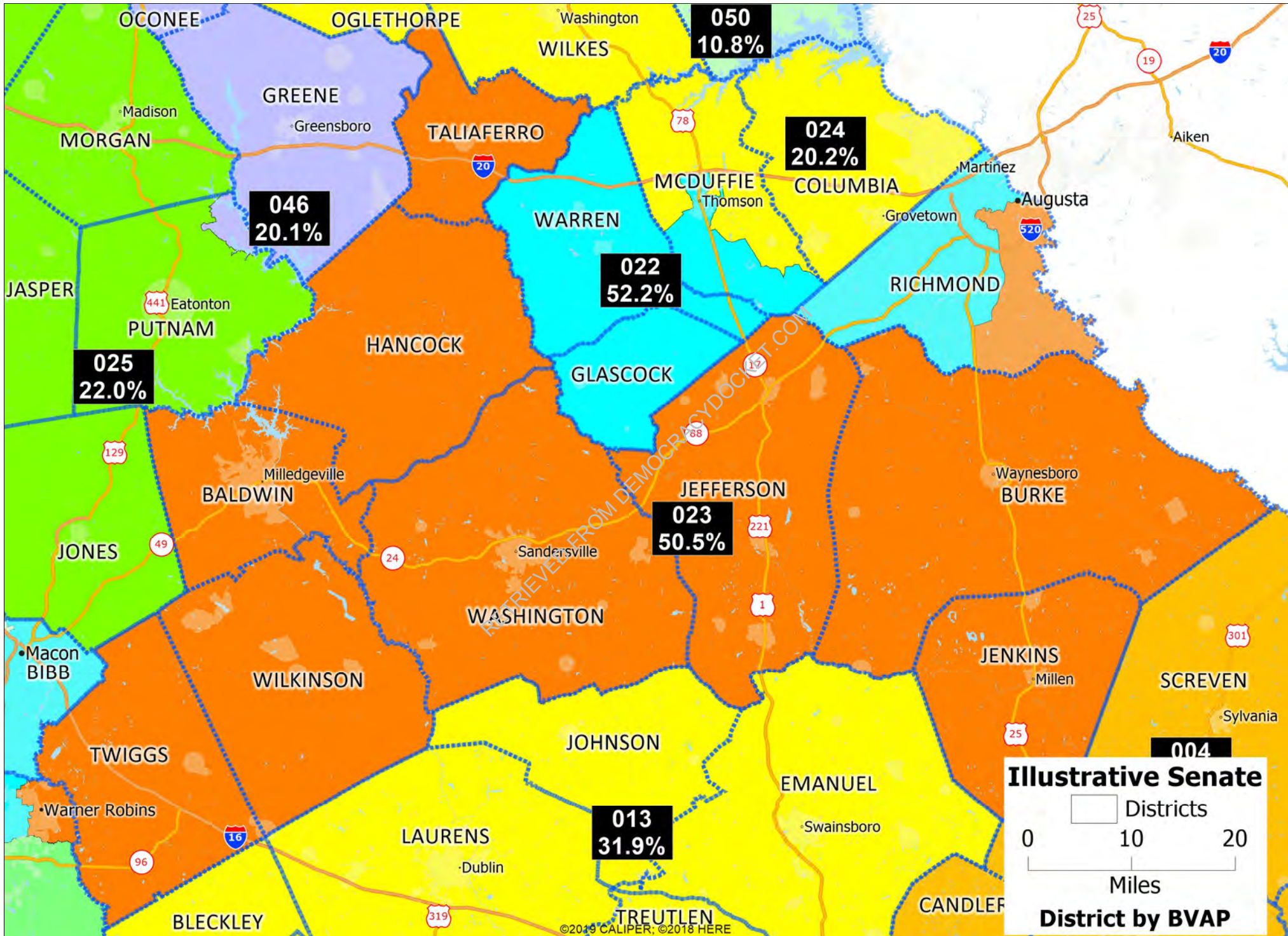




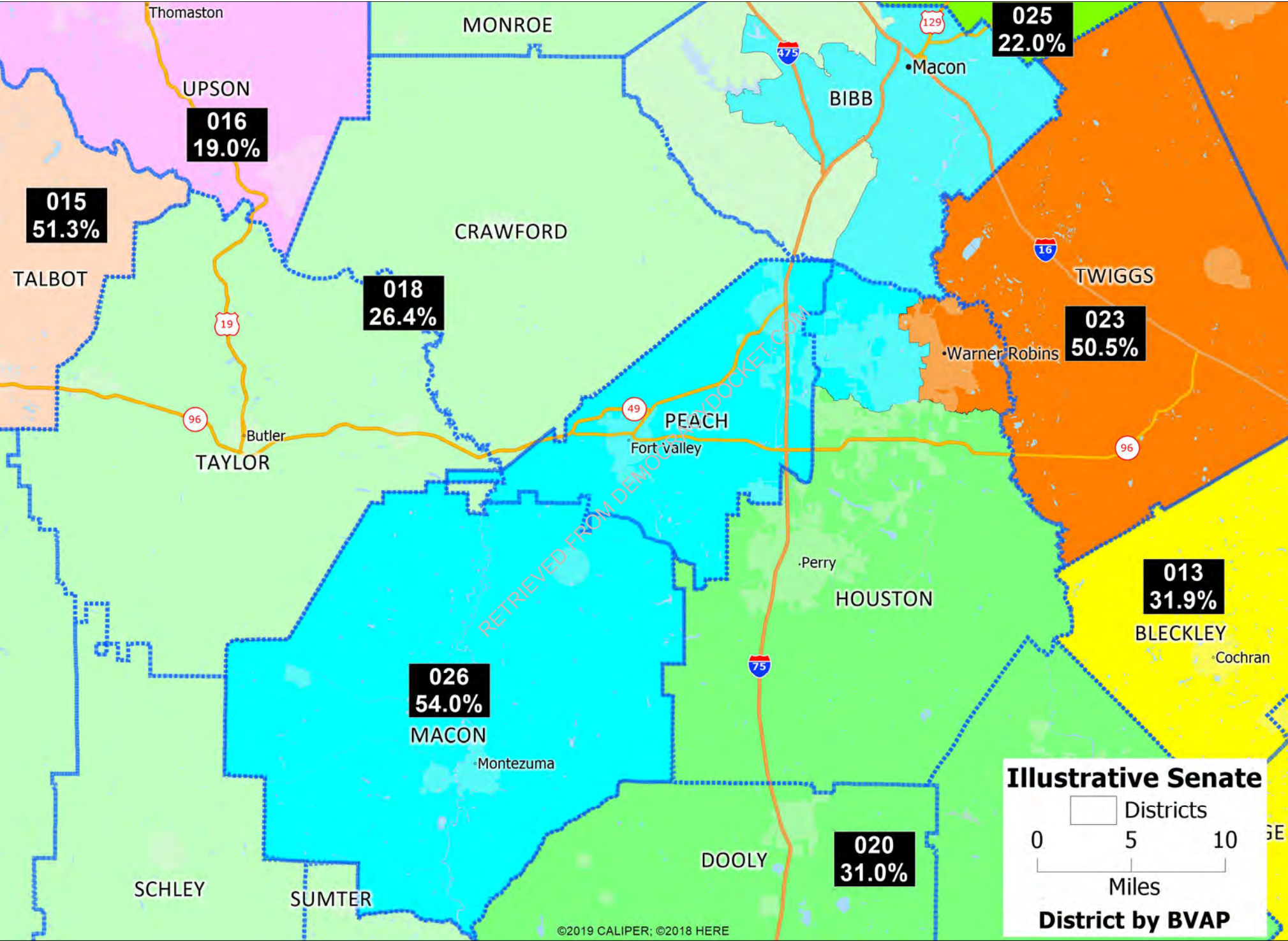




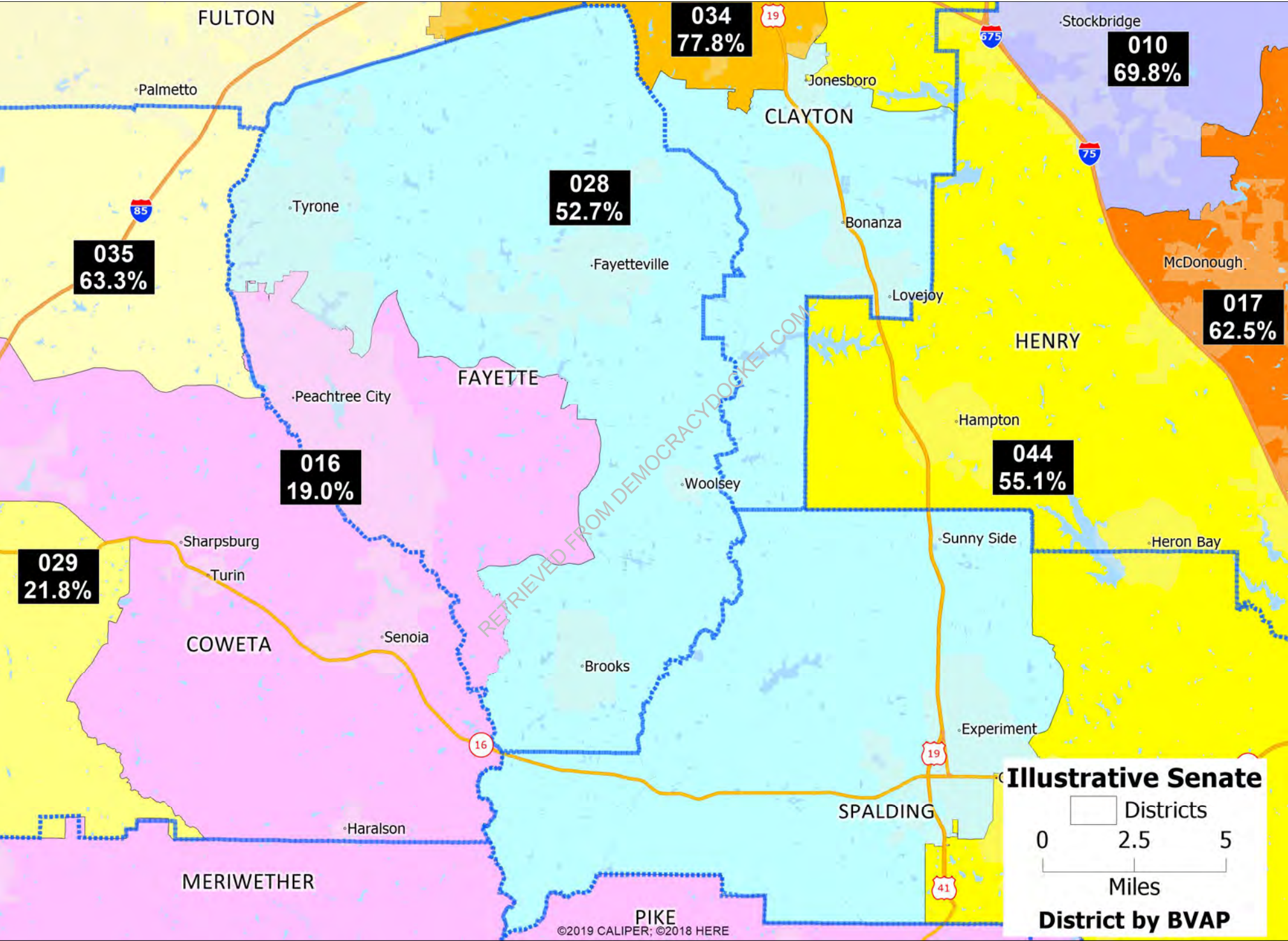


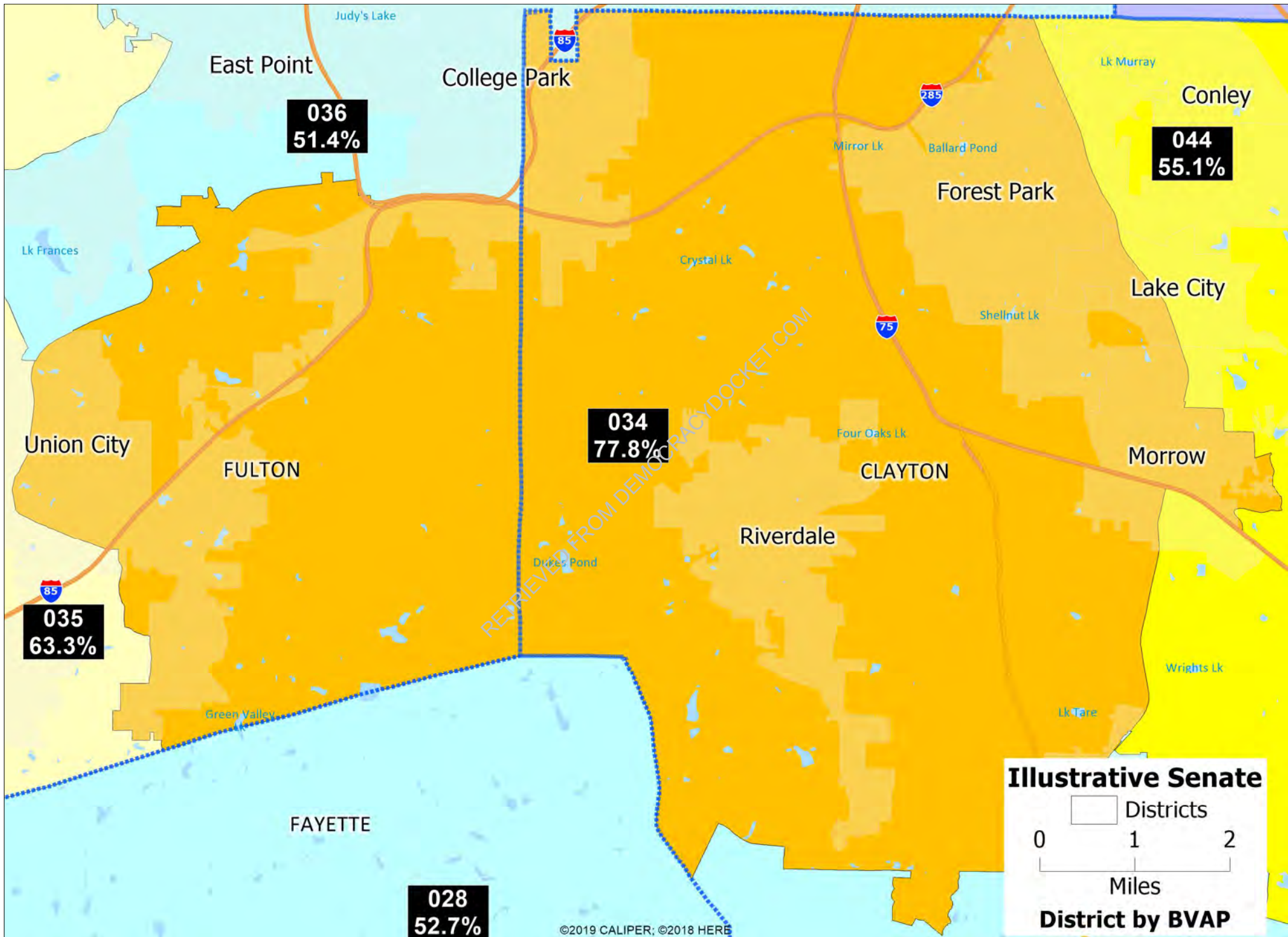




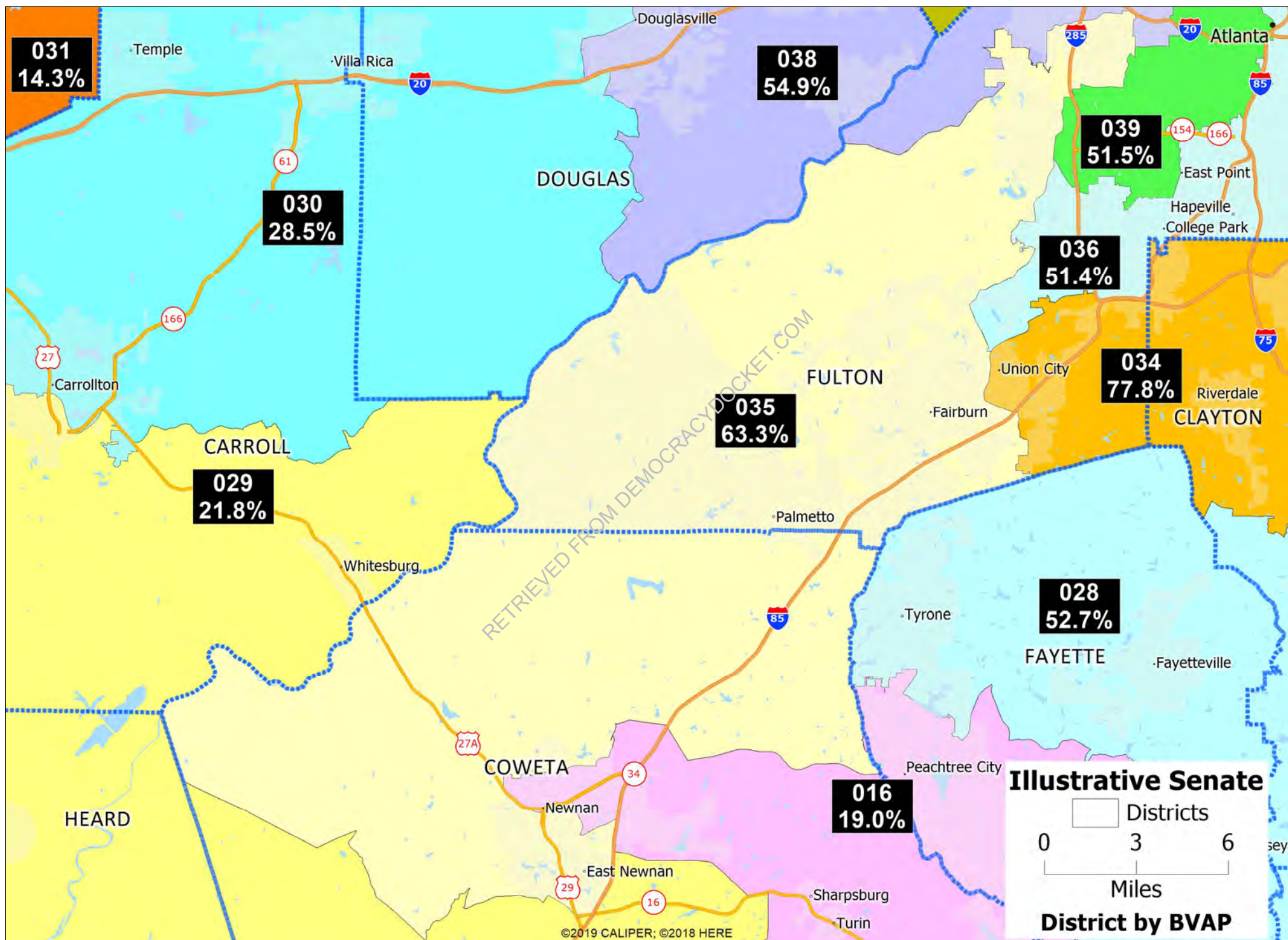




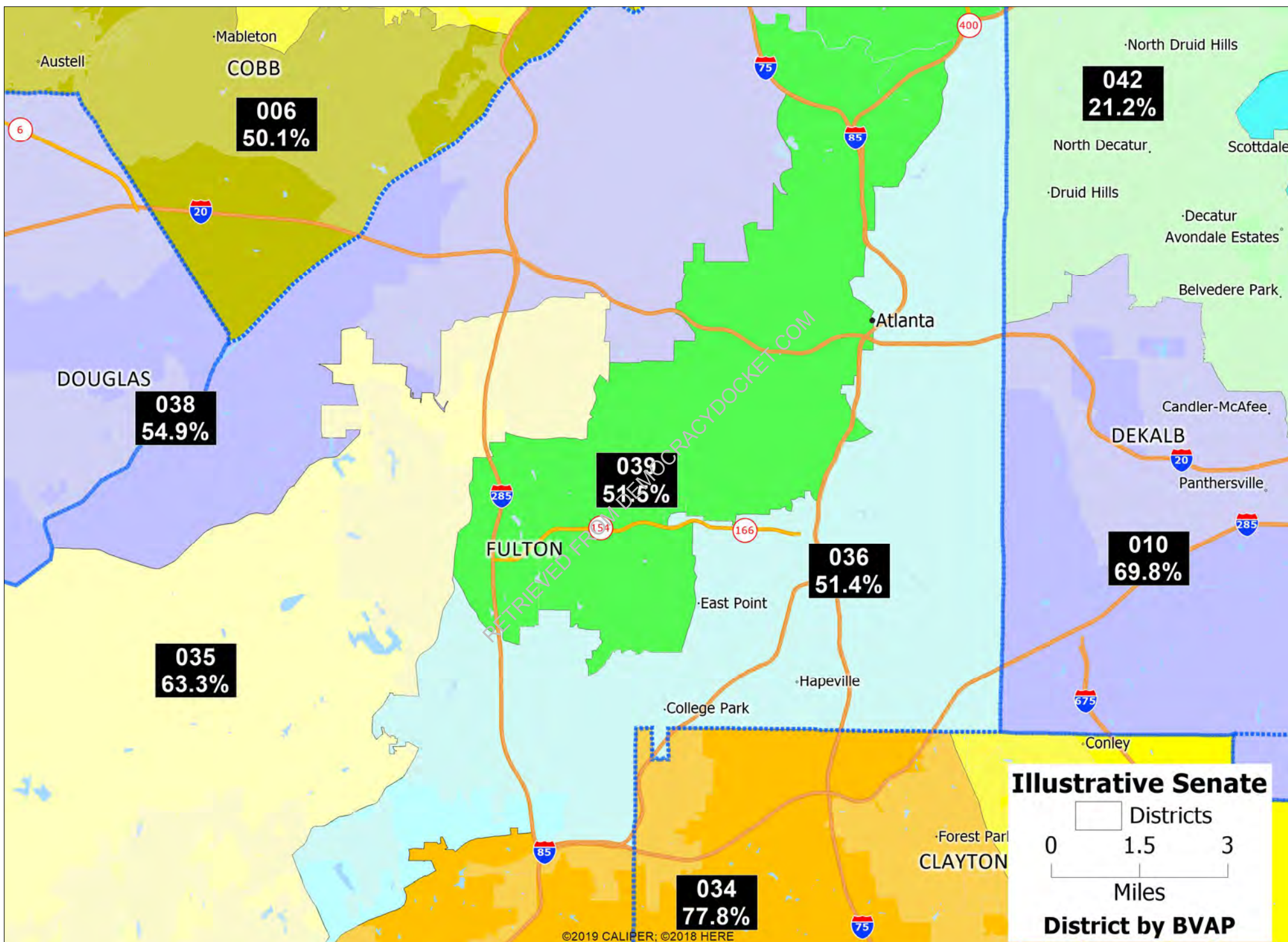




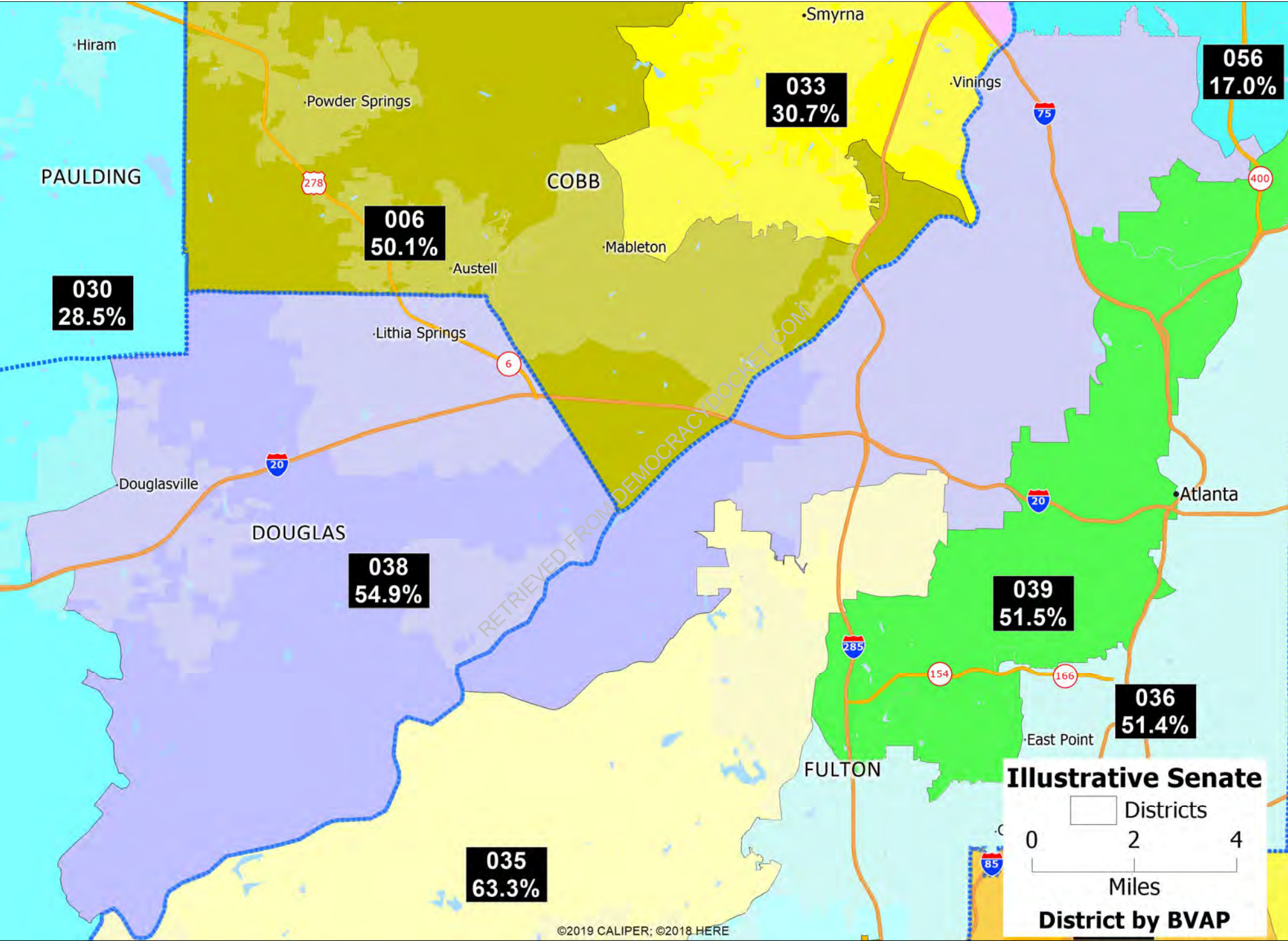


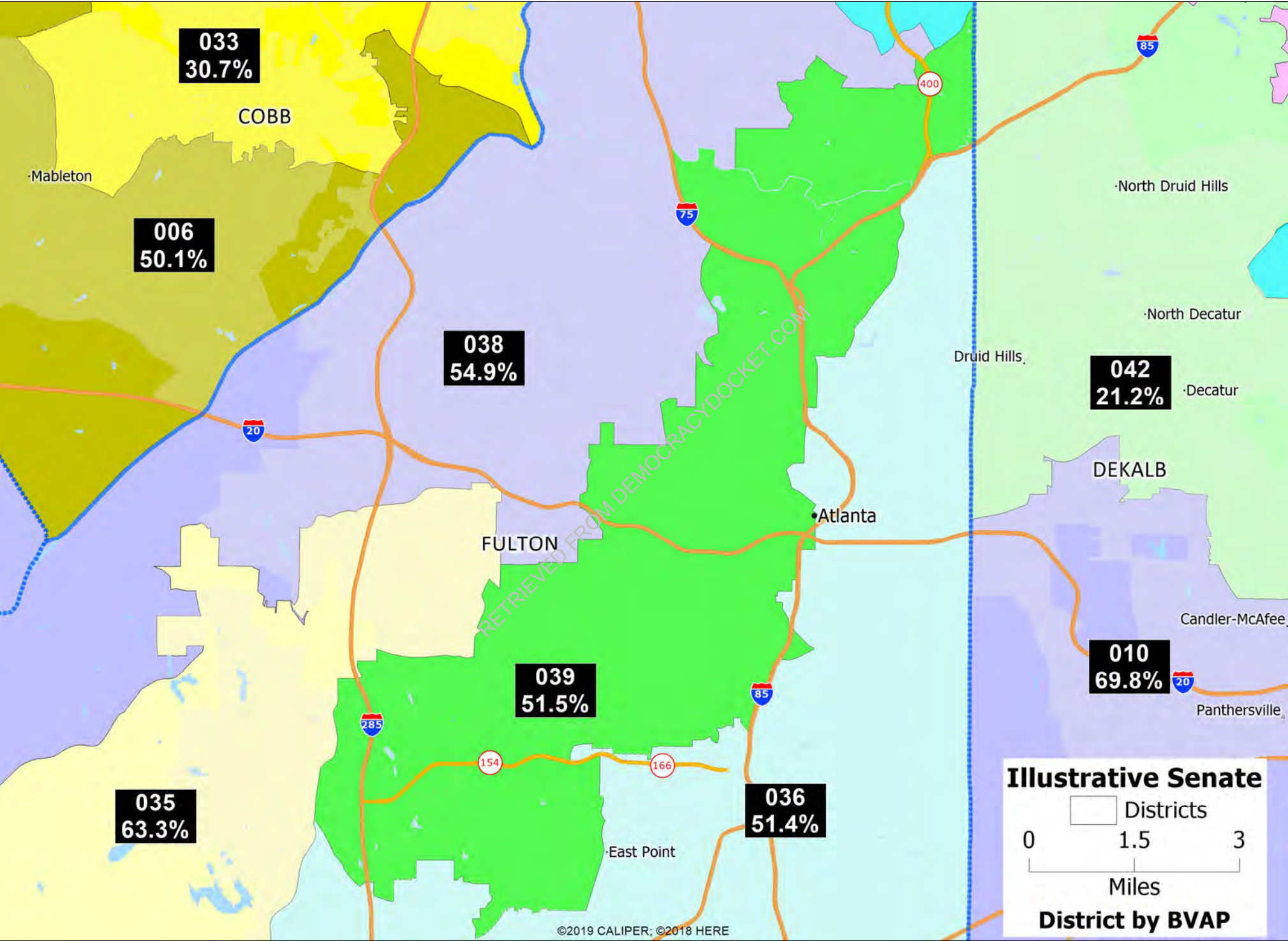




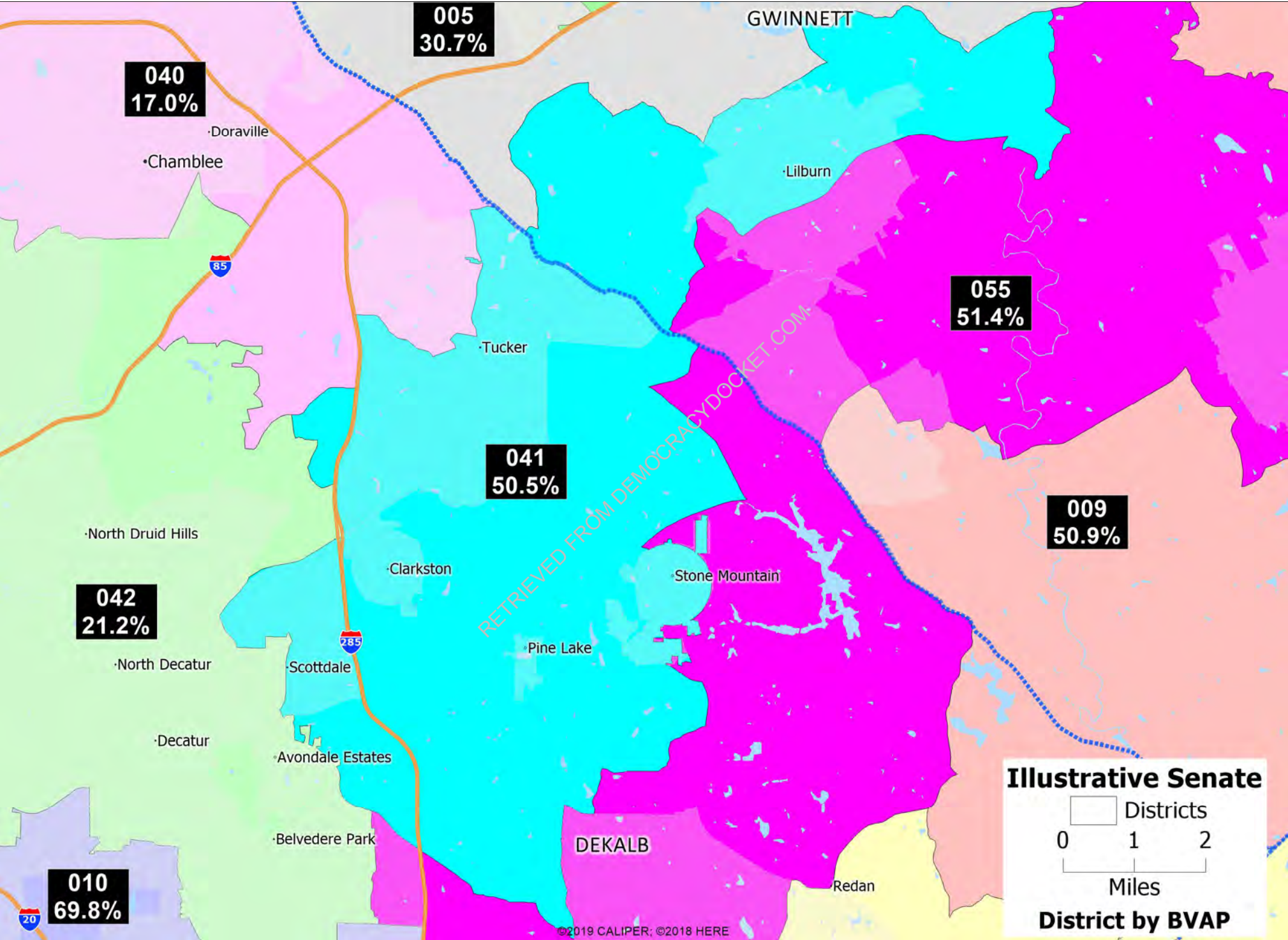




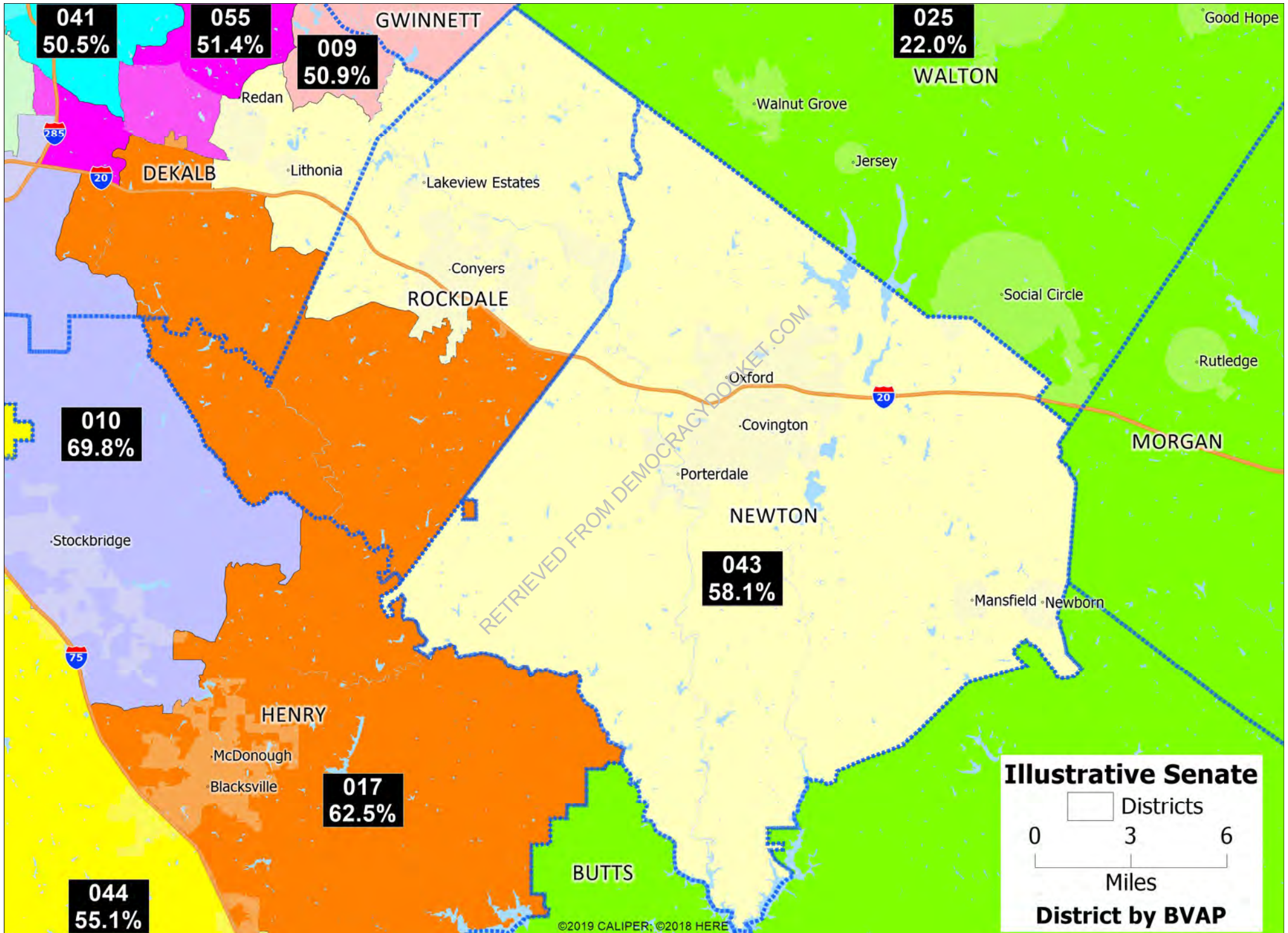




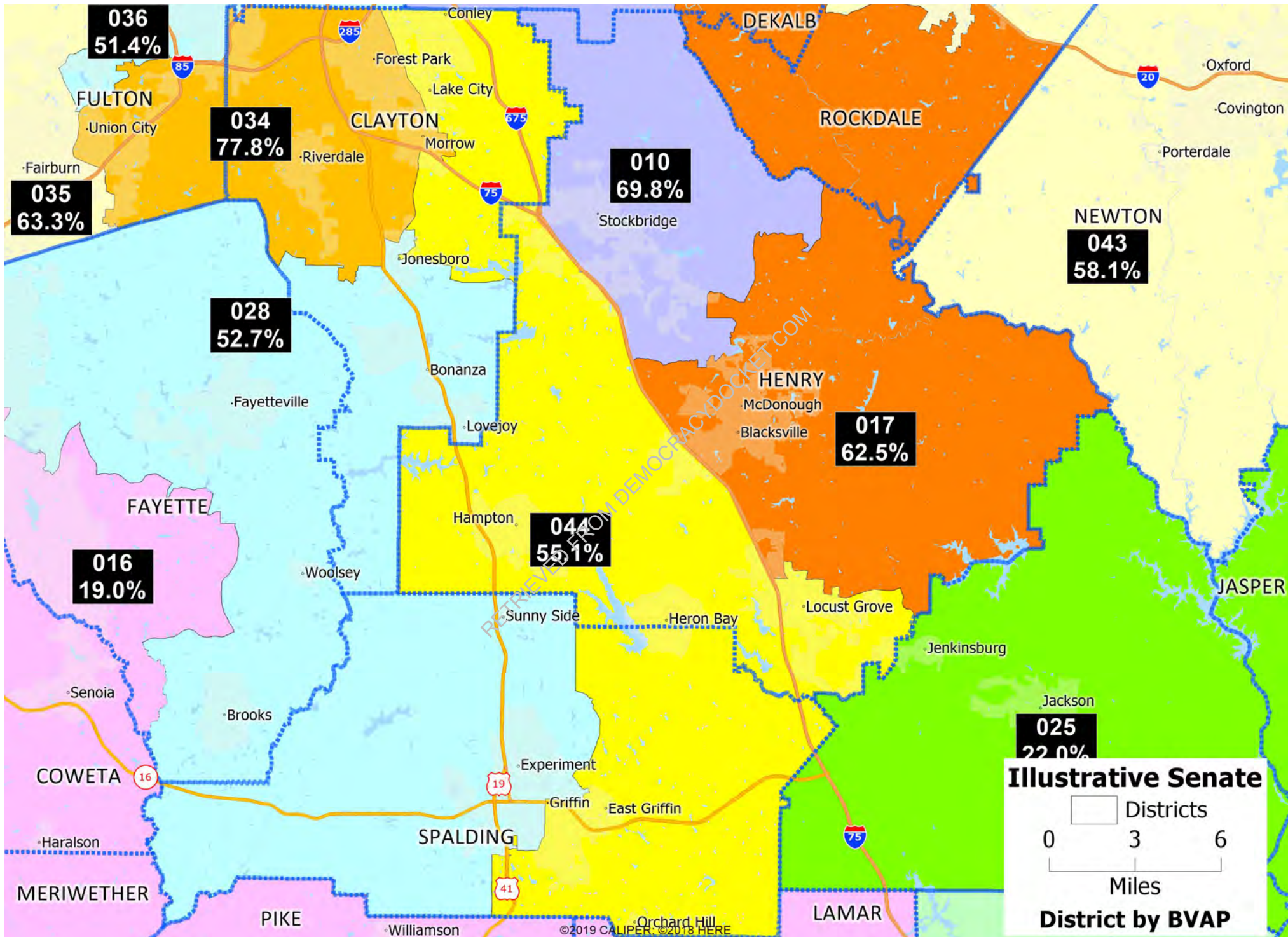




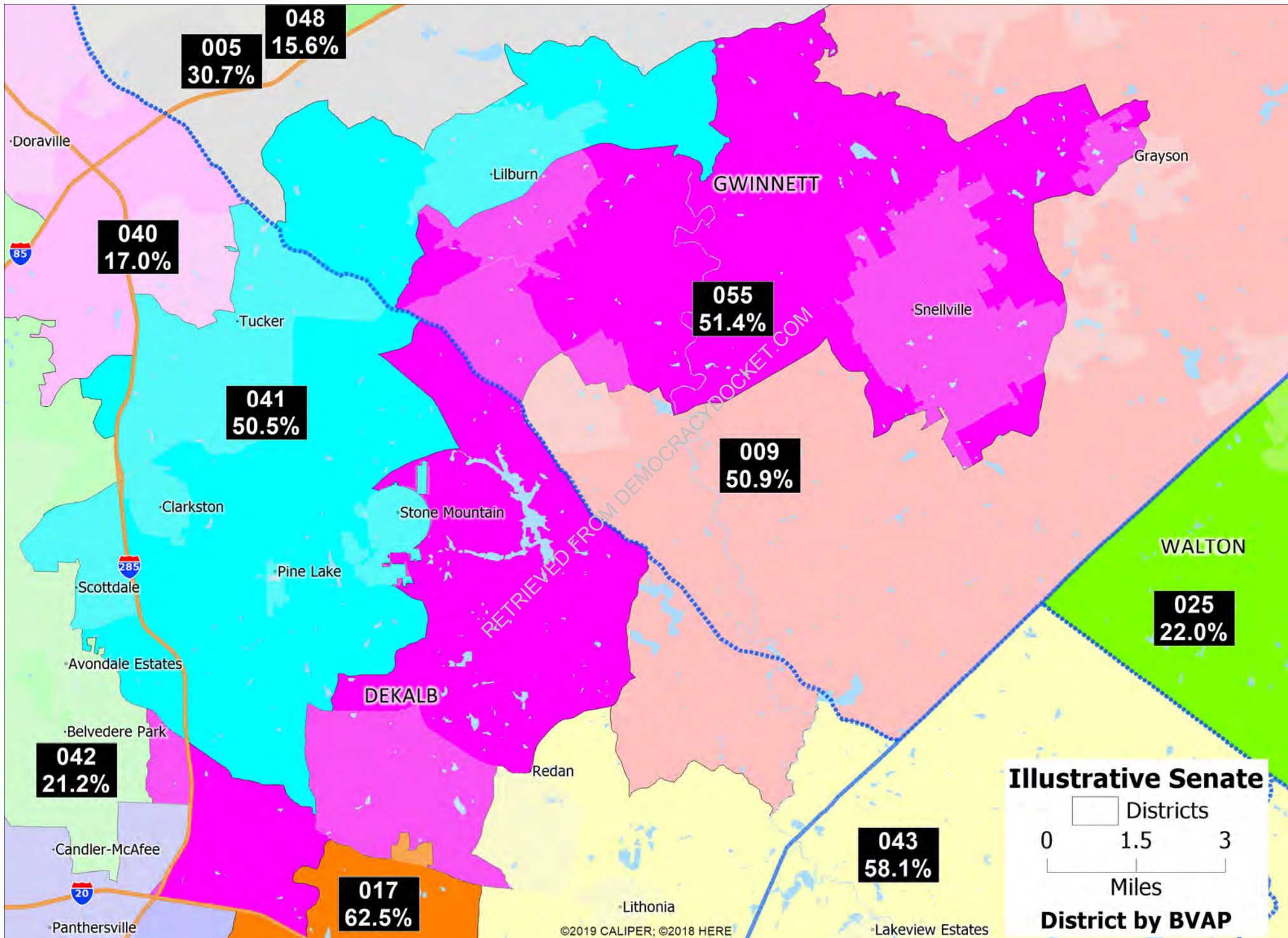












# EXHIBIT O

RETRIEVED FROM DEMOCRACYDOCKET.COM

## Georgia State Senate --Illustrative Plan

District	2020 Pop.	% 2020		18+ AP	18+ AP	18+ NH	% 18+ NH	2015-19	2015-19	2015-19	2015-19	2015-19	Incumbents
		Deviation	18+ Pop								B+L+A	NH White	
				Black	Black	White	White	BCVAP*	LCVAP*	ACVAP*	CVAP*	CVAP*	
001	190422	-0.45%	145737	37684	25.86%	88176	60.50%	24.69%	6.29%	2.52%	33.50%	65.14%	1
002	193187	0.99%	153029	71064	46.44%	62214	40.66%	52.60%	4.26%	1.50%	58.37%	40.79%	1
003	189593	-0.88%	147133	27905	18.97%	105980	72.03%	20.79%	3.07%	1.31%	25.18%	73.98%	1
004	189778	-0.79%	144615	33866	23.42%	98287	67.96%	24.08%	2.63%	0.95%	27.65%	71.69%	1
005	189565	-0.90%	138831	42588	30.68%	29419	21.19%	37.68%	17.32%	11.14%	66.15%	32.70%	1
006	192162	0.46%	144728	72518	50.11%	38268	26.44%	53.94%	9.79%	2.45%	66.17%	33.41%	1
007	191638	0.19%	145231	47324	32.59%	83604	57.57%	32.13%	4.00%	1.15%	37.27%	61.87%	1
008	190960	-0.17%	144081	35029	24.31%	92298	64.06%	26.19%	4.89%	0.46%	31.53%	67.73%	1
009	190917	-0.19%	139935	71186	50.87%	40414	28.88%	50.27%	6.60%	5.01%	61.89%	37.26%	1
010	192564	0.67%	150543	105014	69.76%	33702	22.39%	70.00%	2.80%	1.61%	74.42%	24.98%	1
011	193080	0.94%	146576	43588	29.74%	88210	60.18%	30.87%	3.35%	0.43%	34.65%	64.53%	1
012	192997	0.90%	150855	86499	57.34%	56492	37.45%	58.64%	1.34%	0.73%	60.71%	38.74%	1
013	189512	-0.93%	146437	46703	31.89%	91125	62.23%	32.66%	2.21%	0.49%	35.35%	64.19%	1
014	189408	-0.98%	144804	13381	9.24%	107883	74.50%	9.18%	5.48%	1.39%	16.05%	83.02%	1
015	190014	-0.66%	144217	73953	51.28%	54825	38.02%	50.56%	5.48%	1.73%	57.77%	40.95%	1
016	192188	0.47%	147817	28084	19.00%	104658	70.80%	19.45%	3.29%	1.31%	24.05%	74.81%	1
017	190669	-0.32%	144304	90131	62.46%	44015	30.50%	58.65%	2.75%	1.42%	62.82%	36.47%	1
018	192402	0.58%	149925	39525	26.36%	98905	65.97%	26.25%	3.12%	1.70%	31.08%	68.10%	1
019	190681	-0.32%	136842	17295	12.64%	75740	55.35%	12.09%	6.70%	10.58%	29.37%	69.77%	1
020	190672	-0.32%	144582	44771	30.97%	85398	59.07%	31.82%	3.54%	1.81%	37.17%	62.34%	3
021	190228	-0.55%	143818	11810	8.21%	103899	72.24%	7.93%	5.29%	4.07%	17.29%	81.94%	1
022	192096	0.42%	150253	78364	52.15%	58156	38.71%	52.64%	4.12%	1.80%	58.57%	40.48%	1
023	193019	0.91%	150895	76265	50.54%	66957	44.37%	51.51%	1.90%	0.71%	54.12%	45.58%	0
024	189380	-1.00%	141326	28529	20.19%	94552	66.90%	19.38%	4.31%	3.00%	26.69%	72.23%	1
025	193153	0.98%	148510	32688	22.01%	105624	71.12%	22.67%	2.03%	0.76%	25.46%	74.15%	1
026	191806	0.27%	147242	79463	53.97%	55112	37.43%	55.20%	2.59%	0.91%	58.70%	40.38%	1
027	192327	0.55%	140032	6859	4.90%	99309	70.92%	3.84%	5.52%	4.74%	14.10%	85.27%	1
028	189511	-0.93%	144559	76234	52.74%	52312	36.19%	51.25%	4.28%	2.48%	58.01%	41.27%	1
029	192563	0.67%	148231	32337	21.82%	103502	69.82%	22.52%	2.59%	1.71%	26.81%	72.42%	1
030	191048	-0.12%	143290	40806	28.48%	86001	60.02%	26.49%	4.17%	0.86%	31.52%	67.30%	1
031	192838	0.81%	142871	20412	14.29%	108330	75.82%	12.58%	3.78%	0.81%	17.17%	82.28%	1
032	191998	0.37%	146873	16153	11.00%	101532	69.13%	10.55%	4.88%	6.07%	21.50%	77.60%	1
033	190485	-0.42%	152184	46655	30.66%	69048	45.37%	31.76%	7.31%	4.64%	43.71%	55.22%	0
034	192385	0.58%	141537	110176	77.84%	9886	6.98%	81.66%	4.48%	3.15%	89.29%	9.66%	1
035	190400	-0.46%	144171	91223	63.27%	42330	29.36%	62.32%	3.35%	0.58%	66.25%	33.25%	1
036	189709	-0.82%	155038	79675	51.39%	56246	36.28%	52.74%	3.72%	2.40%	58.87%	40.48%	1
037	191504	0.12%	148063	30815	20.81%	94452	63.79%	19.95%	5.42%	3.59%	28.96%	70.24%	1
038	190975	-0.16%	146599	80528	54.93%	50242	34.27%	55.64%	3.94%	1.59%	61.17%	38.14%	1
039	192517	0.64%	164280	84583	51.49%	57870	35.23%	55.63%	3.38%	4.57%	63.57%	35.72%	1
040	190619	-0.35%	148386	25289	17.04%	77864	52.47%	18.21%	5.78%	8.52%	32.50%	66.67%	1
041	192030	0.39%	143295	72313	50.46%	27568	19.24%	59.17%	5.82%	7.79%	72.78%	26.32%	1
042	190728	-0.29%	152760	32390	21.20%	86335	56.52%	23.86%	4.26%	5.71%	33.82%	65.21%	1
043	192877	0.83%	145032	84221	58.07%	48236	33.26%	55.83%	3.82%	0.95%	60.60%	38.61%	1
044	190473	-0.42%	143652	79117	55.08%	43805	30.49%	52.66%	5.29%	4.82%	62.77%	36.43%	1
045	189946	-0.70%	143418	36029	25.12%	57640	40.19%	24.68%	9.62%	11.80%	46.09%	53.06%	0
046	191838	0.29%	154586	31072	20.10%	101026	65.35%	23.54%	3.76%	2.88%	30.17%	69.04%	1
047	192337	0.55%	143977	14539	10.10%	109022	75.72%	9.56%	4.98%	2.22%	16.76%	82.43%	1
048	192864	0.83%	146388	22776	15.56%	62046	42.38%	17.14%	7.44%	19.14%	43.72%	55.48%	1
049	193020	0.91%	146060	11833	8.10%	92038	63.01%	8.83%	12.41%	2.03%	23.26%	75.92%	1
050	193087	0.94%	151880	16419	10.81%	121009	79.67%	11.88%	3.12%	0.94%	15.94%	83.31%	1
051	192202	0.48%	157732	2079	1.32%	142041	90.05%	1.44%	2.40%	0.54%	4.38%	94.49%	1
052	189397	-0.99%	145086	17368	11.97%	106752	73.58%	11.81%	5.27%	0.99%	18.07%	81.27%	1
053	190553	-0.38%	148171	6801	4.59%	130398	88.01%	4.46%	1.81%	0.73%	7.00%	91.96%	1
054	189836	-0.76%	143725	4156	2.89%	106459	74.07%	3.23%	9.89%	0.75%	13.87%	83.97%	1
055	189516	-0.92%	144254	74077	51.35%	42999	29.81%	53.66%	4.69%	6.02%	64.37%	34.69%	1
056	190234	-0.55%	151878	25818	17.00%	92122	60.66%	18.15%	5.83%	4.34%	28.32%	70.99%	2
<b>Total</b>													
<b>2020</b>													
<b>Pop.</b>	<b>10,711,908</b>	<b>1.99%</b>	<b>8,220,274</b>	<b>2,607,986</b>	<b>31.73%</b>	<b>4,342,333</b>	<b>52.82%</b>						

## Majority Districts

19

20

21

35

## CVAP Source:

\* 2015-19 ACS Special Tabulation

Note: Citizen Voting Age Population (CVAP) percentages are disaggregated from block-group level ACS estimates (with a survey midpoint of July 2017)

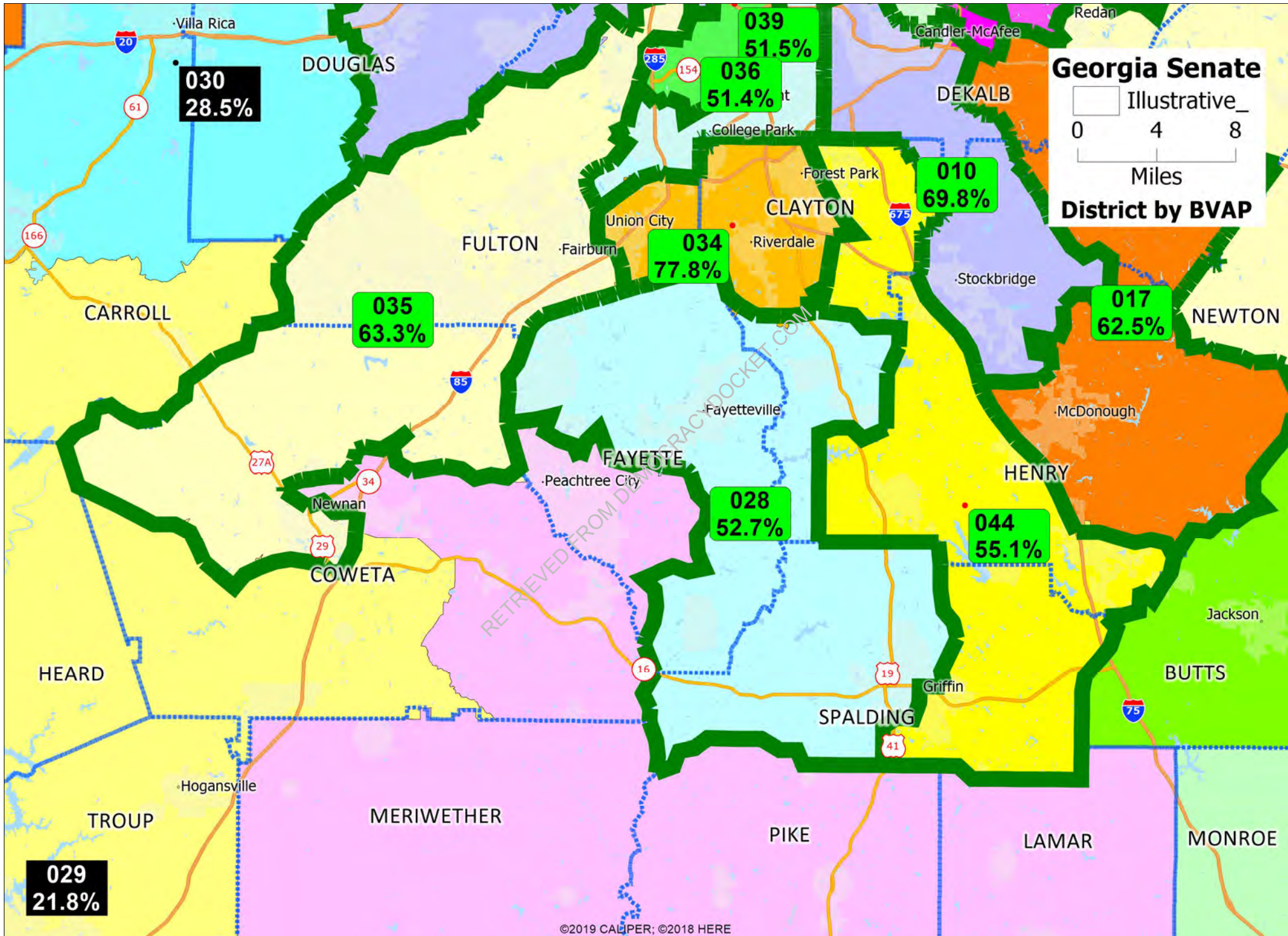
Source for disaggregation: Redistricting Data Hub

<https://redistrictingdatahub.org/dataset/georgia-cvap-data-disaggregated-to-the-2020-block-level-2019/>



# EXHIBIT P-1

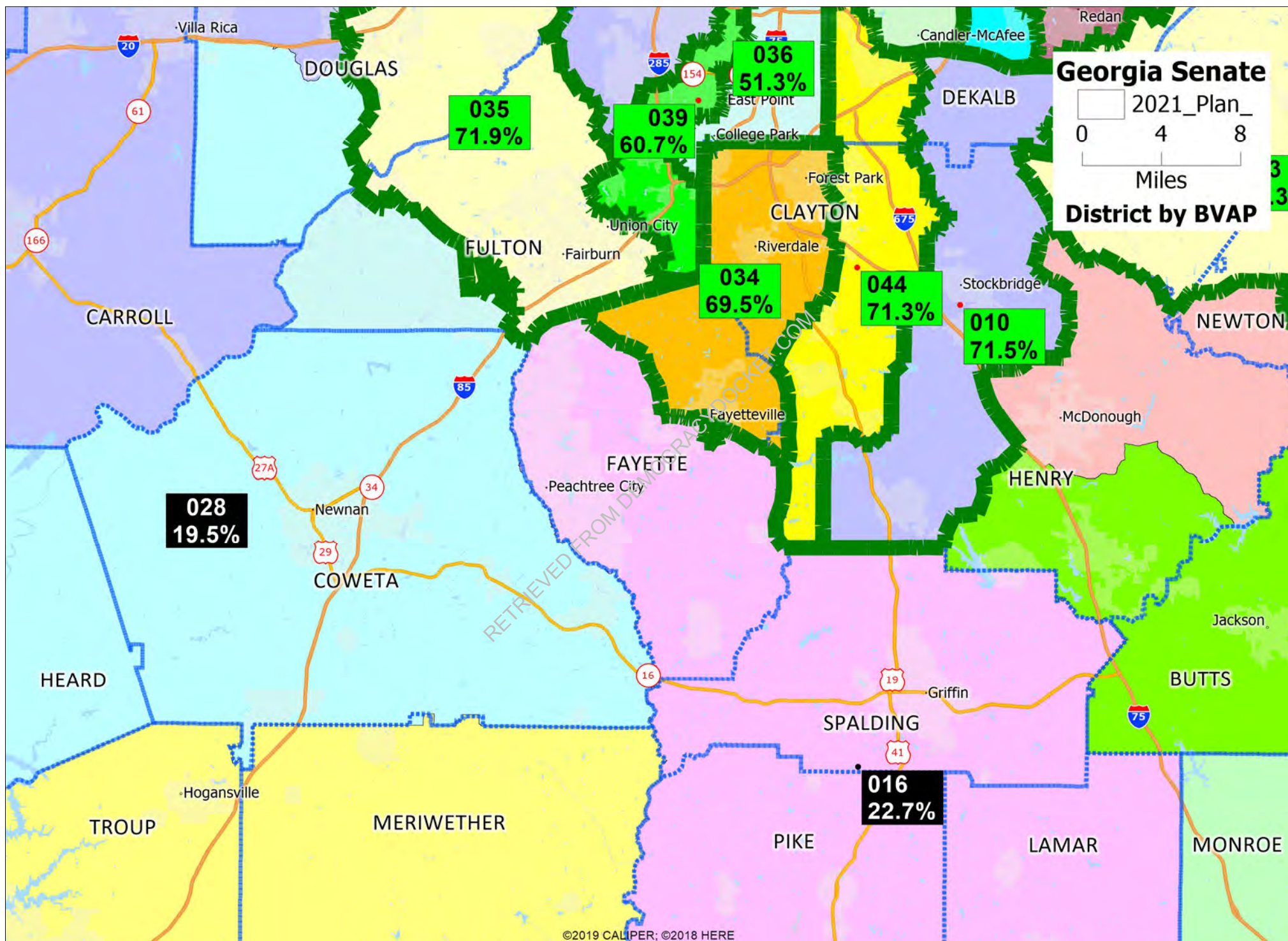
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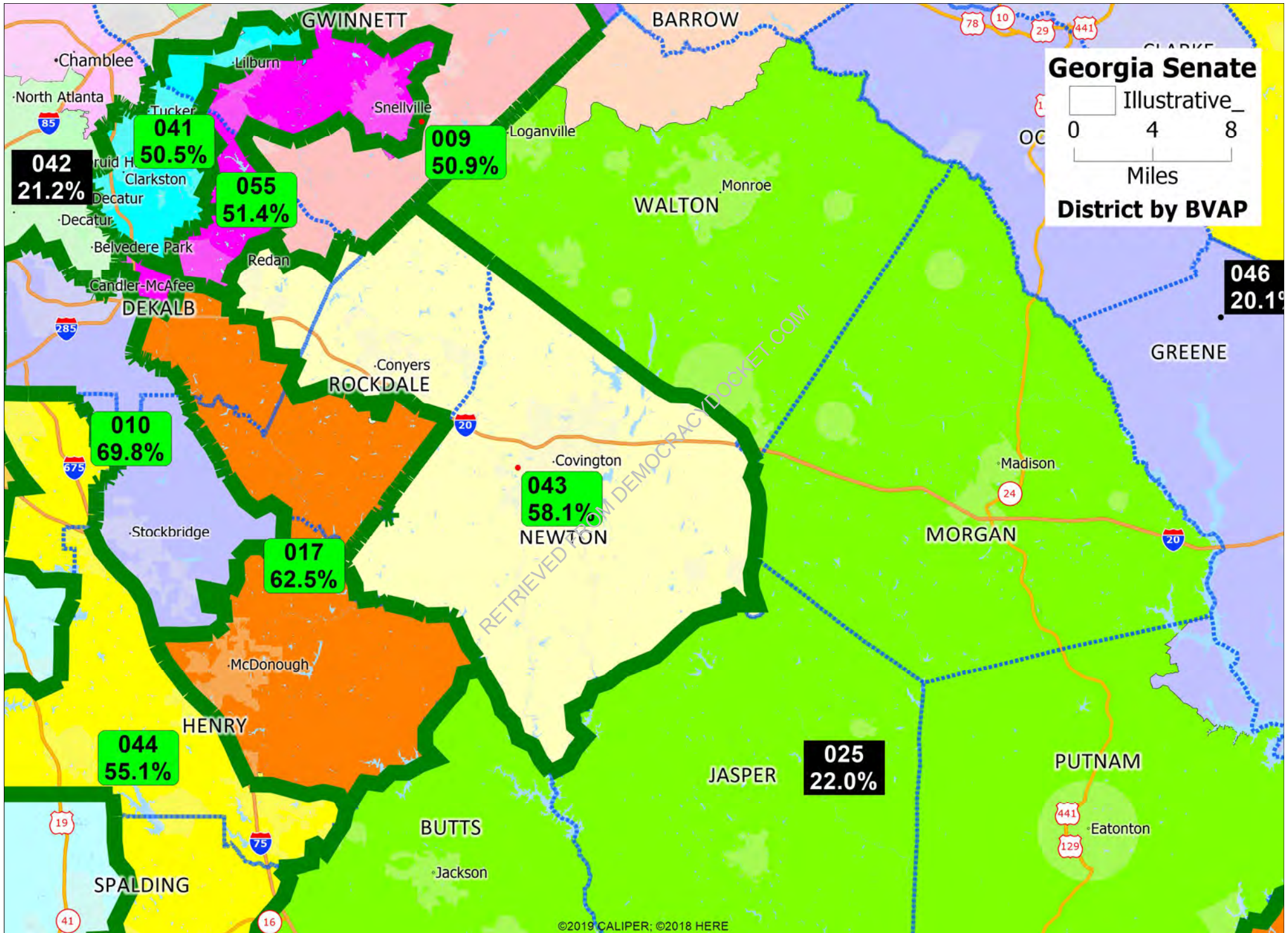






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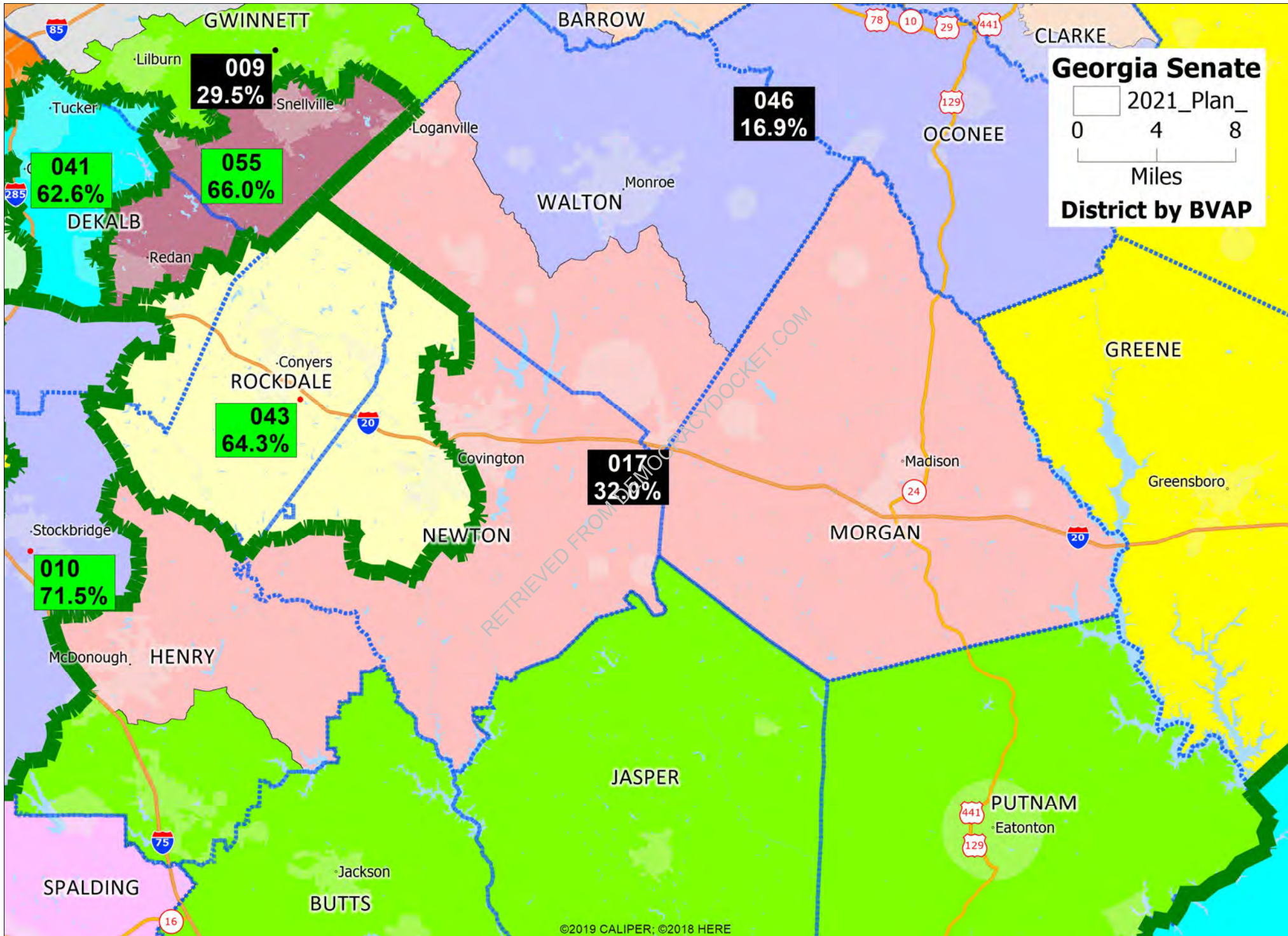
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# EXHIBIT Q-2

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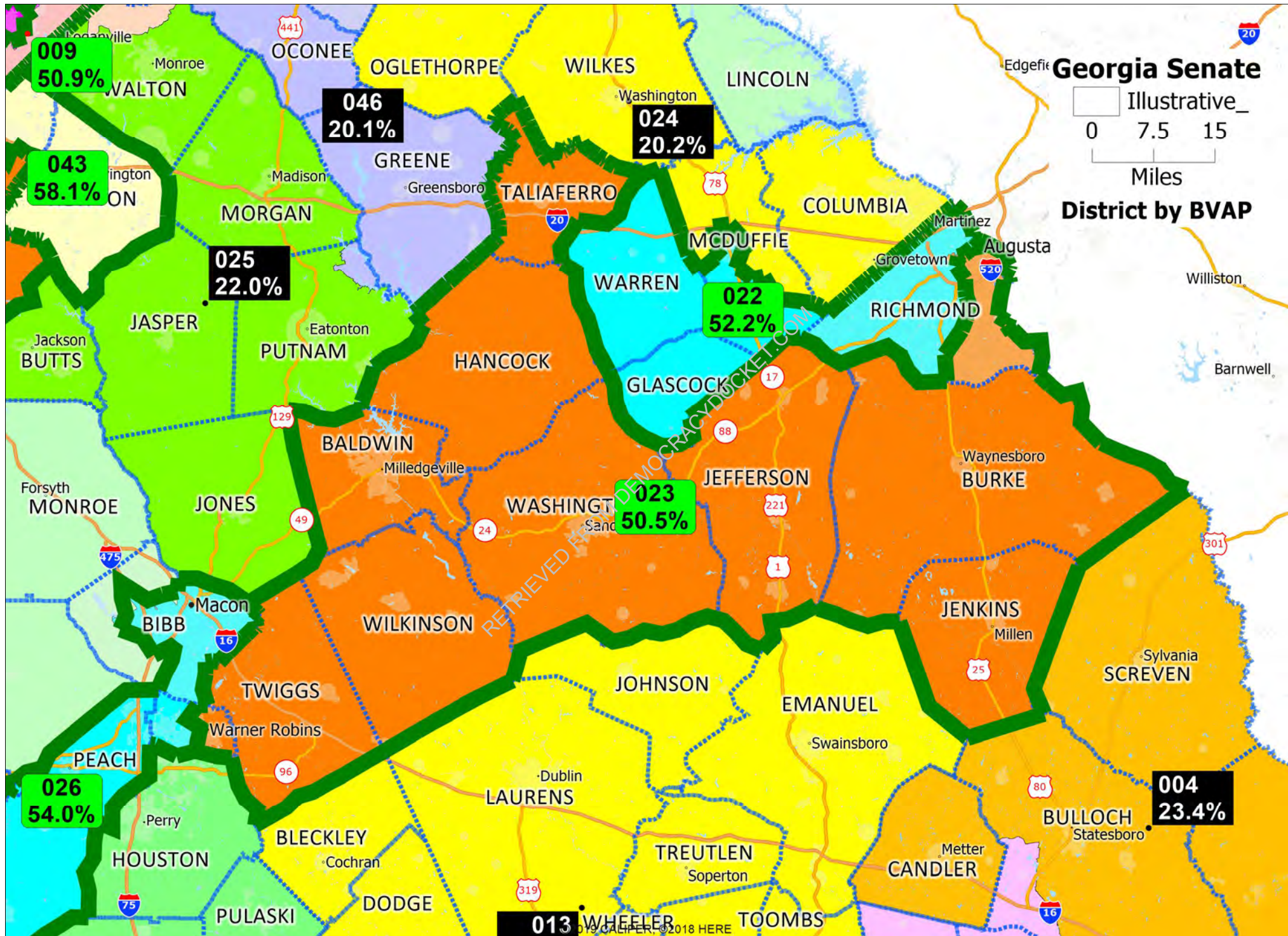






# EXHIBIT R-1

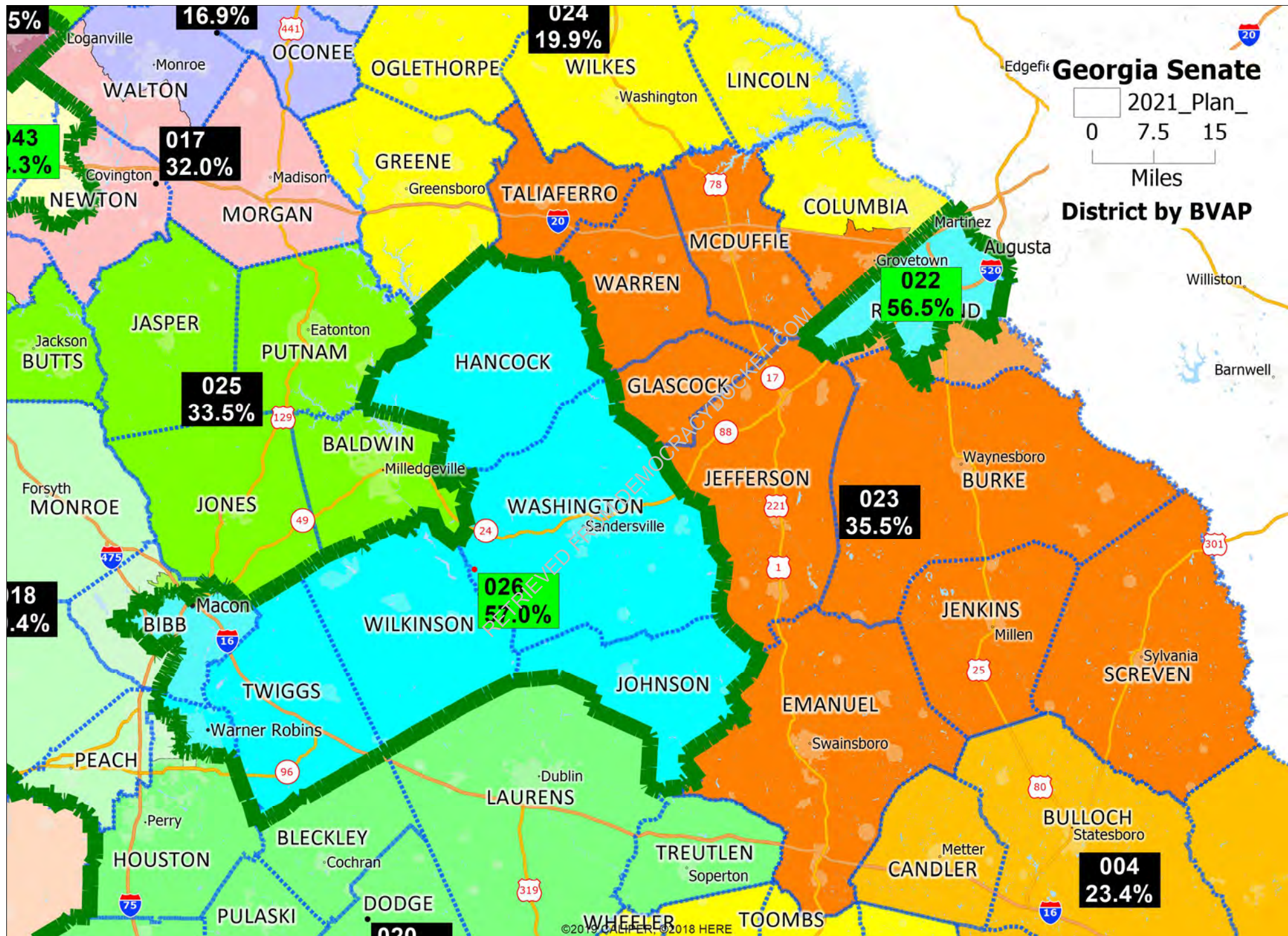
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# EXHIBIT R-2

RETRIEVED FROM DEMOCRACYDOCKET.COM







# EXHIBIT S-1

RETRIEVED FROM DEMOCRACYDOCKET.COM

User:

Plan Name: **Ga\_Senate\_Illustrative\_Plan\_Actual**Plan Type: **Senate**

## Measures of Compactness Report

Sunday, January 9, 2022

8:07 PM

	<b>Reock</b>	<b>Polsby-Popper</b>
Sum	N/A	N/A
Min	0.17	0.11
Max	0.68	0.52
Mean	0.38	0.25
Std. Dev.	0.11	0.08

<b>District</b>	<b>Reock</b>	<b>Polsby-Popper</b>
001	0.40	0.19
002	0.47	0.24
003	0.51	0.31
004	0.45	0.23
005	0.17	0.15
006	0.43	0.23
007	0.42	0.20
008	0.45	0.22
009	0.33	0.21
010	0.32	0.25
011	0.34	0.27

**Measures of Compactness Report**

Ga\_Senate\_Illustrative\_Plan\_A

	<b>Reock</b>	<b>Polsby-Popper</b>
Sum	N/A	N/A
Min	0.17	0.11
Max	0.68	0.52
Mean	0.38	0.25
Std. Dev.	0.11	0.08

<b>District</b>	<b>Reock</b>	<b>Polsby-Popper</b>
012	0.50	0.35
013	0.47	0.27
014	0.42	0.25
015	0.32	0.27
016	0.49	0.26
017	0.37	0.18
018	0.24	0.11
019	0.27	0.27
020	0.35	0.21
021	0.38	0.29
022	0.34	0.19
023	0.35	0.16
024	0.30	0.24
025	0.45	0.24

**Measures of Compactness Report**

Ga\_Senate\_Illustrative\_Plan\_A

	<b>Reock</b>	<b>Polsby-Popper</b>
Sum	N/A	N/A
Min	0.17	0.11
Max	0.68	0.52
Mean	0.38	0.25
Std. Dev.	0.11	0.08

<b>District</b>	<b>Reock</b>	<b>Polsby-Popper</b>
026	0.27	0.15
027	0.50	0.45
028	0.49	0.22
029	0.32	0.23
030	0.43	0.26
031	0.54	0.43
032	0.38	0.26
033	0.42	0.17
034	0.56	0.40
035	0.28	0.21
036	0.19	0.16
037	0.68	0.52
038	0.24	0.17
039	0.22	0.18



**Measures of Compactness Report**

Ga\_Senate\_Illustrative\_Plan\_A

	<b>Reock</b>	<b>Polsby-Popper</b>
Sum	N/A	N/A
Min	0.17	0.11
Max	0.68	0.52
Mean	0.38	0.25
Std. Dev.	0.11	0.08

<b>District</b>	<b>Reock</b>	<b>Polsby-Popper</b>
040	0.34	0.29
041	0.32	0.18
042	0.36	0.25
043	0.45	0.28
044	0.25	0.19
045	0.29	0.24
046	0.39	0.27
047	0.36	0.33
048	0.41	0.24
049	0.57	0.38
050	0.21	0.15
051	0.53	0.36
052	0.48	0.32
053	0.40	0.38

**Measures of Compactness Report**

Ga\_Senate\_Illustrative\_Plan\_A

	<b>Reock</b>	<b>Polsby-Popper</b>
Sum	N/A	N/A
Min	0.17	0.11
Max	0.68	0.52
Mean	0.38	0.25
Std. Dev.	0.11	0.08

<b>District</b>	<b>Reock</b>	<b>Polsby-Popper</b>
054	0.41	0.22
055	0.23	0.13
056	0.26	0.25

RETRIEVED FROM DEMOCRACYDOCKET.COM

## Measures of Compactness Report

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Ga\_Senate\_Illustrative\_Plan\_A

### Measures of Compactness Summary

<b>Reock</b>	The measure is always between 0 and 1, with 1 being the most compact.
<b>Polsby-Popper</b>	The measure is always between 0 and 1, with 1 being the most compact.

RETRIEVED FROM DEMOCRACYDOCKET.COM

# EXHIBIT S-2

RETRIEVED FROM DEMOCRACYDOCKET.COM



User:

Plan Name: **Benchmark 2015 Senate Plan**Plan Type: **Senate**

## Measures of Compactness Report

Thursday, January 6, 2022

3:35 PM

	<b>Reock</b>	<b>Polsby-Popper</b>
Sum	N/A	N/A
Min	0.14	0.11
Max	0.68	0.62
Mean	0.43	0.27
Std. Dev.	0.11	0.10

<b>District</b>	<b>Reock</b>	<b>Polsby-Popper</b>
1	0.49	0.27
2	0.47	0.22
3	0.54	0.31
4	0.34	0.19
5	0.17	0.17
6	0.51	0.20
7	0.28	0.18
8	0.43	0.35
9	0.33	0.22
10	0.37	0.27
11	0.47	0.27

**Measures of Compactness Report**

Enacted Senate B-V-C

	<b>Reock</b>	<b>Polsby-Popper</b>
Sum	N/A	N/A
Min	0.14	0.11
Max	0.68	0.62
Mean	0.43	0.27
Std. Dev.	0.11	0.10

<b>District</b>	<b>Reock</b>	<b>Polsby-Popper</b>
12	0.53	0.28
13	0.48	0.20
14	0.48	0.24
15	0.56	0.33
16	0.37	0.32
17	0.32	0.15
18	0.49	0.22
19	0.47	0.28
20	0.40	0.24
21	0.44	0.22
22	0.39	0.34
23	0.45	0.15
24	0.36	0.23
25	0.52	0.20

**Measures of Compactness Report**

Enacted Senate B-V-C

	<b>Reock</b>	<b>Polsby-Popper</b>
Sum	N/A	N/A
Min	0.14	0.11
Max	0.68	0.62
Mean	0.43	0.27
Std. Dev.	0.11	0.10

<b>District</b>	<b>Reock</b>	<b>Polsby-Popper</b>
26	0.47	0.21
27	0.57	0.53
28	0.50	0.22
29	0.51	0.34
30	0.40	0.26
31	0.50	0.51
32	0.42	0.24
33	0.33	0.23
34	0.40	0.32
35	0.42	0.18
36	0.25	0.28
37	0.68	0.62
38	0.47	0.21
39	0.14	0.11

**Measures of Compactness Report**

Enacted Senate B-V-C

	<b>Reock</b>	<b>Polsby-Popper</b>
Sum	N/A	N/A
Min	0.14	0.11
Max	0.68	0.62
Mean	0.43	0.27
Std. Dev.	0.11	0.10

<b>District</b>	<b>Reock</b>	<b>Polsby-Popper</b>
40	0.49	0.29
41	0.31	0.21
42	0.44	0.28
43	0.56	0.27
44	0.19	0.18
45	0.47	0.36
46	0.36	0.27
47	0.34	0.20
48	0.42	0.31
49	0.49	0.41
50	0.40	0.23
51	0.61	0.36
52	0.49	0.29
53	0.51	0.49



**Measures of Compactness Report**

Enacted Senate B-V-C

	<b>Reock</b>	<b>Polsby-Popper</b>
Sum	N/A	N/A
Min	0.14	0.11
Max	0.68	0.62
Mean	0.43	0.27
Std. Dev.	0.11	0.10

<b>District</b>	<b>Reock</b>	<b>Polsby-Popper</b>
54	0.44	0.27
55	0.25	0.23
56	0.43	0.27

RETRIEVED FROM DEMOCRACYDOCKET.COM

## Measures of Compactness Report

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Enacted Senate B-V-C

### Measures of Compactness Summary

<b>Reock</b>	The measure is always between 0 and 1, with 1 being the most compact.
<b>Polsby-Popper</b>	The measure is always between 0 and 1, with 1 being the most compact.

RETRIEVED FROM DEMOCRACYDOCKET.COM

# EXHIBIT S-3

RETRIEVED FROM DEMOCRACYDOCKET.COM

User:

Plan Name: **Senate 2021 Plan**Plan Type: **Senate**

## Measures of Compactness Report

Thursday, January 6, 2022

3:33 PM

	<b>Reock</b>	<b>Polsby-Popper</b>
Sum	N/A	N/A
Min	0.17	0.12
Max	0.68	0.50
Mean	0.42	0.29
Std. Dev.	0.11	0.08

<b>District</b>	<b>Reock</b>	<b>Polsby-Popper</b>
1	0.49	0.31
2	0.47	0.22
3	0.39	0.21
4	0.47	0.27
5	0.17	0.21
6	0.41	0.24
7	0.35	0.34
8	0.45	0.23
9	0.24	0.21
10	0.28	0.23
11	0.36	0.33



**Measures of Compactness Report**

GA\_senate\_DRA

	<b>Reock</b>	<b>Polsby-Popper</b>
Sum	N/A	N/A
Min	0.17	0.12
Max	0.68	0.50
Mean	0.42	0.29
Std. Dev.	0.11	0.08

<b>District</b>	<b>Reock</b>	<b>Polsby-Popper</b>
12	0.62	0.39
13	0.45	0.26
14	0.27	0.24
15	0.57	0.32
16	0.37	0.31
17	0.35	0.17
18	0.47	0.21
19	0.53	0.37
20	0.41	0.36
21	0.42	0.33
22	0.41	0.29
23	0.37	0.16
24	0.37	0.21
25	0.39	0.24

**Measures of Compactness Report**

GA\_senate\_DRA

	<b>Reock</b>	<b>Polsby-Popper</b>
Sum	N/A	N/A
Min	0.17	0.12
Max	0.68	0.50
Mean	0.42	0.29
Std. Dev.	0.11	0.08

<b>District</b>	<b>Reock</b>	<b>Polsby-Popper</b>
26	0.47	0.20
27	0.50	0.46
28	0.45	0.25
29	0.58	0.42
30	0.60	0.41
31	0.37	0.38
32	0.29	0.21
33	0.40	0.22
34	0.45	0.34
35	0.47	0.26
36	0.32	0.29
37	0.49	0.37
38	0.36	0.21
39	0.17	0.12

**Measures of Compactness Report**

GA\_senate\_DRA

	<b>Reock</b>	<b>Polsby-Popper</b>
Sum	N/A	N/A
Min	0.17	0.12
Max	0.68	0.50
Mean	0.42	0.29
Std. Dev.	0.11	0.08

<b>District</b>	<b>Reock</b>	<b>Polsby-Popper</b>
40	0.51	0.34
41	0.51	0.30
42	0.48	0.32
43	0.64	0.35
44	0.18	0.19
45	0.35	0.30
46	0.37	0.21
47	0.36	0.19
48	0.35	0.34
49	0.46	0.34
50	0.45	0.23
51	0.68	0.50
52	0.47	0.25
53	0.49	0.40

**Measures of Compactness Report**

GA\_senate\_DRA

	<b>Reock</b>	<b>Polsby-Popper</b>
Sum	N/A	N/A
Min	0.17	0.12
Max	0.68	0.50
Mean	0.42	0.29
Std. Dev.	0.11	0.08

<b>District</b>	<b>Reock</b>	<b>Polsby-Popper</b>
54	0.60	0.44
55	0.34	0.27
56	0.38	0.30

RETRIEVED FROM DEMOCRACYDOCKET.COM



## Measures of Compactness Report

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GA\_senate\_DRA

### Measures of Compactness Summary

<b>Reock</b>	The measure is always between 0 and 1, with 1 being the most compact.
<b>Polsby-Popper</b>	The measure is always between 0 and 1, with 1 being the most compact.

RETRIEVED FROM DEMOCRACYDOCKET.COM

# EXHIBIT T-1

RETRIEVED FROM DEMOCRACYDOCKET.COM

User:

Plan Name: **Ga\_Senate\_Illustrative\_Plan\_Actual**Plan Type: **Senate**

## Political Subdivison Splits Between Districts

Sunday, January 9, 2022

8:12 PM

### Split Counts

Number of subdivisions split into more than one district: Number of splits involving no population:

County 33 County 0

Number of times a subdivision is split into multiple districts:

County 59

Voting District 58

County	District	Population
<i>Split Counties:</i>		
Bartow GA	014	38,068
Bartow GA	031	9,970
Bartow GA	052	52,270
Bartow GA	054	8,593
Berrien GA	007	5,909
Berrien GA	011	12,251
Bibb GA	018	61,973
Bibb GA	026	95,373
Bryan GA	001	23,062
Bryan GA	004	21,676
Bulloch GA	004	78,285
Bulloch GA	008	2,814
Carroll GA	029	39,161
Carroll GA	030	79,987
Charlton GA	003	1,614
Charlton GA	007	10,904
Chatham GA	001	102,104
Chatham GA	002	193,187
Cherokee GA	014	151,340
Cherokee GA	021	115,280
Clayton GA	028	73,570
Clayton GA	034	139,632
Clayton GA	044	84,393
Cobb GA	006	192,162
Cobb GA	032	191,998
Cobb GA	033	190,485
Cobb GA	037	191,504
Coweta GA	016	62,034
Coweta GA	029	15,255
Coweta GA	035	68,869
DeKalb GA	009	12,903
DeKalb GA	010	116,405
DeKalb GA	017	57,301

**Political Subdivison Splits Between Districts**

Ga\_Senate\_Illustrative\_Plan\_A

<b>County</b>	<b>District</b>	<b>Population</b>
DeKalb GA	040	140,179
DeKalb GA	041	135,790
DeKalb GA	042	190,728
DeKalb GA	043	35,612
DeKalb GA	055	75,464
Douglas GA	030	52,496
Douglas GA	038	91,741
Fayette GA	016	44,452
Fayette GA	028	74,742
Forsyth GA	019	58,956
Forsyth GA	027	192,327
Fulton GA	021	74,948
Fulton GA	034	52,753
Fulton GA	035	121,531
Fulton GA	036	189,709
Fulton GA	038	99,234
Fulton GA	039	192,517
Fulton GA	040	50,440
Fulton GA	048	95,344
Fulton GA	056	190,234
Gordon GA	052	38,543
Gordon GA	054	19,001
Gwinnett GA	005	189,565
Gwinnett GA	009	178,014
Gwinnett GA	019	131,725
Gwinnett GA	041	56,240
Gwinnett GA	045	189,946
Gwinnett GA	048	97,520
Gwinnett GA	055	114,052
Hall GA	049	193,020
Hall GA	051	10,116
Henry GA	010	76,159
Henry GA	017	84,580
Henry GA	044	79,973
Houston GA	020	89,465
Houston GA	023	17,798
Houston GA	026	56,370
Madison GA	047	21,345
Madison GA	050	8,775
McDuffie GA	022	12,652
McDuffie GA	024	8,980
Muscogee GA	015	184,281
Muscogee GA	029	22,641
Paulding GA	030	58,565
Paulding GA	031	110,096
Putnam GA	025	19,594
Putnam GA	046	2,453

**Political Subdivision Splits Between Districts**

Ga\_Senate\_Illustrative\_Plan\_A

<b>County</b>	<b>District</b>	<b>Population</b>
Richmond GA	022	171,345
Richmond GA	023	35,262
Rockdale GA	017	48,788
Rockdale GA	043	44,782
Spalding GA	028	41,199
Spalding GA	044	26,107
Sumter GA	012	22,647
Sumter GA	018	6,969
Walton GA	025	85,093
Walton GA	047	11,580
Whitfield GA	053	13,811
Whitfield GA	054	89,053
<i>Split VTDs:</i>		
Bartow GA	014	11,564
Bartow GA	054	17
Bartow GA	014	39
Bartow GA	052	16,566
Bartow GA	031	6,001
Bartow GA	052	1,436
Bryan GA	001	2,342
Bryan GA	004	1,291
Bryan GA	001	1,443
Bryan GA	004	2,293
Bryan GA	001	1,291
Bryan GA	004	4,165
Bulloch GA	004	12,359
Bulloch GA	008	320
Bulloch GA	004	10,420
Bulloch GA	008	286
Carroll GA	029	267
Carroll GA	030	5,697
Chatham GA	001	1,350
Chatham GA	002	886
Cherokee GA	014	67
Cherokee GA	021	9,994
Cobb GA	006	3,766
Cobb GA	033	406
Cobb GA	006	3,735
Cobb GA	033	1,361
Cobb GA	032	599
Cobb GA	037	3,844
Cobb GA	006	6,260
Cobb GA	033	0
Cobb GA	006	408
Cobb GA	033	9,586
Cobb GA	006	4,220
Cobb GA	033	4,679



**Political Subdivison Splits Between Districts**

Ga\_Senate\_Illustrative\_Plan\_A

<b>County</b>	<b>District</b>	<b>Population</b>
Cobb GA	006	20
Cobb GA	033	4,314
Cobb GA	006	6,108
Cobb GA	033	18
Cobb GA	006	11,408
Cobb GA	033	1,580
Cobb GA	037	0
Cobb GA	006	1,356
Cobb GA	033	7,239
Coweta GA	016	2,198
Coweta GA	035	967
Coweta GA	016	2,391
Coweta GA	035	2,677
Coweta GA	016	12,601
Coweta GA	035	1,510
Coweta GA	016	3,245
Coweta GA	035	2,690
DeKalb GA	040	775
DeKalb GA	041	4,135
Fayette GA	016	3,333
Fayette GA	028	1,190
Forsyth GA	019	935
Forsyth GA	027	24,923
Fulton GA	021	1,084
Fulton GA	056	2,734
Fulton GA	035	1,388
Fulton GA	038	11
Fulton GA	034	6,151
Fulton GA	035	14
Fulton GA	034	624
Fulton GA	035	35
Gwinnett GA	005	197
Gwinnett GA	009	8,636
Gwinnett GA	009	4,502
Gwinnett GA	045	6,610
Gwinnett GA	009	2,346
Gwinnett GA	045	1,858
Henry GA	010	6,521
Henry GA	017	631
Henry GA	010	4,704
Henry GA	017	1,084
Madison GA	047	278
Madison GA	050	746
Madison GA	047	253
Madison GA	050	1,977
Madison GA	047	4,114
Madison GA	050	68

**Political Subdivision Splits Between Districts**

Ga\_Senate\_Illustrative\_Plan\_A

<b>County</b>	<b>District</b>	<b>Population</b>
Madison GA	047	86
Madison GA	050	262
McDuffie GA	022	1,902
McDuffie GA	024	45
McDuffie GA	022	3,825
McDuffie GA	024	454
McDuffie GA	022	1,679
McDuffie GA	024	974
McDuffie GA	022	14
McDuffie GA	024	1,286
Paulding GA	030	8,775
Paulding GA	031	5,221
Paulding GA	030	561
Paulding GA	031	21,593
Putnam GA	025	1,990
Putnam GA	046	2,453
Richmond GA	022	6,574
Richmond GA	023	666
Richmond GA	022	2,794
Richmond GA	023	74
Rockdale GA	017	5,131
Rockdale GA	043	5
Rockdale GA	017	428
Rockdale GA	043	10,539
Sumter GA	012	153
Sumter GA	018	2,528
Sumter GA	012	6,105
Sumter GA	018	12
Sumter GA	012	5,204
Sumter GA	018	422
Walton GA	025	2,859
Walton GA	047	1,578
Walton GA	025	1,388
Walton GA	047	3,912

# EXHIBIT T-2

RETRIEVED FROM DEMOCRACYDOCKET.COM

User:

Plan Name: 2015 Benchmark Senate Plan

Plan Type: Senate

## Political Subdivision Splits Between Districts

Thursday, January 6, 2022

1:49 PM

### Split Counts

Number of subdivisions split into more than one district: Number of splits involving no population:

County 38 County 0

Number of times a subdivision is split into multiple districts:

County 65

Voting District 136

County	District	Population
<i>Split Counties:</i>		
Bartow GA	14	66,766
Bartow GA	52	42,135
Bibb GA	18	57,255
Bibb GA	25	13,774
Bibb GA	26	86,317
Carroll GA	28	12,484
Carroll GA	30	106,664
Charlton GA	3	9,186
Charlton GA	7	3,332
Chatham GA	1	105,799
Chatham GA	2	189,492
Chattooga GA	52	2,099
Chattooga GA	53	22,866
Cherokee GA	14	113,395
Cherokee GA	21	144,103
Cherokee GA	56	9,122
Clarke GA	46	80,075
Clarke GA	47	48,596
Clayton GA	34	155,066
Clayton GA	44	142,529
Cobb GA	6	112,153
Cobb GA	14	21,460
Cobb GA	32	166,845
Cobb GA	33	194,620
Cobb GA	37	192,450
Cobb GA	38	78,621
Columbia GA	23	34,830
Columbia GA	24	121,180
DeKalb GA	10	91,065
DeKalb GA	40	154,756
DeKalb GA	41	139,553
DeKalb GA	42	188,406
DeKalb GA	43	51,713

**Political Subdivison Splits Between Districts**

Enacted Senate B-V-C

<b>County</b>	<b>District</b>	<b>Population</b>
DeKalb GA	44	55,842
DeKalb GA	55	83,047
Douglas GA	30	38,405
Douglas GA	35	105,832
Emanuel GA	4	15,972
Emanuel GA	23	6,796
Fayette GA	16	80,417
Fayette GA	34	38,777
Forsyth GA	27	247,844
Forsyth GA	51	3,439
Fulton GA	6	98,379
Fulton GA	21	69,557
Fulton GA	28	2,645
Fulton GA	32	24,975
Fulton GA	35	101,619
Fulton GA	36	194,797
Fulton GA	38	115,726
Fulton GA	39	205,632
Fulton GA	40	10,084
Fulton GA	48	63,353
Fulton GA	56	179,943
Gordon GA	52	36,593
Gordon GA	54	20,951
Gwinnett GA	5	196,143
Gwinnett GA	9	208,385
Gwinnett GA	40	30,729
Gwinnett GA	41	56,587
Gwinnett GA	45	214,703
Gwinnett GA	48	134,053
Gwinnett GA	55	116,462
Hall GA	49	196,756
Hall GA	50	6,380
Henry GA	10	98,285
Henry GA	17	142,427
Houston GA	18	28,294
Houston GA	20	122,866
Houston GA	26	12,473
Jackson GA	47	39,860
Jackson GA	50	36,047
Jones GA	25	10,646
Jones GA	26	17,701
Liberty GA	1	48,350
Liberty GA	19	16,906
Mitchell GA	11	10,482
Mitchell GA	12	11,273
Muscogee GA	15	120,417
Muscogee GA	29	86,505



**Political Subdivison Splits Between Districts**

Enacted Senate B-V-C

<b>County</b>	<b>District</b>	<b>Population</b>
Newton GA	17	42,844
Newton GA	43	69,639
Paulding GA	30	40,559
Paulding GA	31	128,102
Pickens GA	51	20,594
Pickens GA	54	12,622
Richmond GA	22	177,079
Richmond GA	23	28,691
Richmond GA	24	837
Rockdale GA	17	18,357
Rockdale GA	43	75,213
Sumter GA	12	22,647
Sumter GA	13	6,969
Tattnall GA	4	9,697
Tattnall GA	19	13,145
Thomas GA	8	7,615
Thomas GA	11	38,183
Troup GA	28	21,060
Troup GA	29	48,366
Walton GA	25	14,790
Walton GA	46	81,883
Wilcox GA	7	4,634
Wilcox GA	13	4,132
<i>Split VTDs:</i>		
Bartow GA	14	7,937
Bartow GA	52	2,431
Bartow GA	14	0
Bartow GA	52	11,544
Bartow GA	14	55
Bartow GA	52	4,398
Bartow GA	14	0
Bartow GA	52	5,760
Bibb GA	18	0
Bibb GA	26	7,233
Bibb GA	18	3,716
Bibb GA	25	8,938
Bibb GA	18	2,840
Bibb GA	26	1,941
Carroll GA	28	2,102
Carroll GA	30	2,084
Carroll GA	28	0
Carroll GA	30	6,319
Charlton GA	3	250
Charlton GA	7	796
Charlton GA	3	74
Charlton GA	7	299
Chatham GA	1	4,854

**Political Subdivison Splits Between Districts**

Enacted Senate B-V-C

<b>County</b>	<b>District</b>	<b>Population</b>
Chatham GA	2	0
Chatham GA	1	10,322
Chatham GA	2	0
Chatham GA	1	136
Chatham GA	2	11,852
Chatham GA	1	1,940
Chatham GA	2	1,221
Cherokee GA	14	2,161
Cherokee GA	21	3,210
Cherokee GA	14	235
Cherokee GA	21	5,348
Cherokee GA	21	896
Cherokee GA	56	9,122
Clayton GA	34	0
Clayton GA	44	5,962
Clayton GA	34	0
Clayton GA	44	5,626
Cobb GA	14	4,918
Cobb GA	32	3,763
Cobb GA	6	13,386
Cobb GA	33	15
Cobb GA	33	1,395
Cobb GA	37	2,527
Cobb GA	32	3,257
Cobb GA	33	1,944
Cobb GA	33	465
Cobb GA	37	5,405
Cobb GA	32	2,462
Cobb GA	33	1,956
Cobb GA	14	599
Cobb GA	37	3,844
Cobb GA	14	0
Cobb GA	37	9,502
Cobb GA	33	3,613
Cobb GA	38	2,070
Cobb GA	33	5,734
Cobb GA	37	0
Cobb GA	6	4,288
Cobb GA	33	5,706
Cobb GA	33	2,163
Cobb GA	37	312
Cobb GA	33	8,899
Cobb GA	37	0
Cobb GA	33	3,175
Cobb GA	37	1,586
Cobb GA	32	1,996
Cobb GA	33	2,558

**Political Subdivison Splits Between Districts**

Enacted Senate B-V-C

<b>County</b>	<b>District</b>	<b>Population</b>
Cobb GA	6	2,819
Cobb GA	33	4,092
Cobb GA	33	4,563
Cobb GA	37	0
Cobb GA	6	6,108
Cobb GA	38	18
Cobb GA	6	0
Cobb GA	38	7,801
Cobb GA	6	3,998
Cobb GA	38	613
Cobb GA	6	1,580
Cobb GA	33	11,408
Cobb GA	33	6,498
Cobb GA	37	0
Cobb GA	14	1,785
Cobb GA	32	1,900
Cobb GA	6	9,407
Cobb GA	38	385
Cobb GA	6	3,009
Cobb GA	38	5,199
Cobb GA	6	6,937
Cobb GA	33	52
Cobb GA	6	7,365
Cobb GA	38	726
Cobb GA	6	5,076
Cobb GA	32	4,735
Cobb GA	14	6,409
Cobb GA	37	0
Columbia GA	23	3,125
Columbia GA	24	24
Columbia GA	23	0
Columbia GA	24	2,945
Columbia GA	23	6,021
Columbia GA	24	18
DeKalb GA	41	277
DeKalb GA	42	3,290
DeKalb GA	42	0
DeKalb GA	44	3,608
DeKalb GA	41	14,754
DeKalb GA	42	0
DeKalb GA	41	2,485
DeKalb GA	42	0
DeKalb GA	40	2,899
DeKalb GA	42	10,190
DeKalb GA	42	4,553
DeKalb GA	44	398
DeKalb GA	10	7,575

**Political Subdivison Splits Between Districts**

Enacted Senate B-V-C

<b>County</b>	<b>District</b>	<b>Population</b>
DeKalb GA	43	0
DeKalb GA	41	1,304
DeKalb GA	42	4,577
DeKalb GA	10	6,326
DeKalb GA	55	35
DeKalb GA	43	3,296
DeKalb GA	55	460
DeKalb GA	42	0
DeKalb GA	44	3,001
DeKalb GA	43	193
DeKalb GA	55	2,871
DeKalb GA	43	5,432
DeKalb GA	55	0
DeKalb GA	42	0
DeKalb GA	44	2,987
DeKalb GA	40	831
DeKalb GA	41	4,079
DeKalb GA	10	0
DeKalb GA	43	4,576
Fayette GA	16	3,730
Fayette GA	34	9
Forsyth GA	27	6,673
Forsyth GA	51	3,439
Fulton GA	38	867
Fulton GA	39	0
Fulton GA	6	6,397
Fulton GA	39	0
Fulton GA	21	5,975
Fulton GA	48	46
Fulton GA	21	2,488
Fulton GA	56	0
Fulton GA	21	72
Fulton GA	48	1,344
Fulton GA	48	0
Fulton GA	56	4,390
Fulton GA	28	208
Fulton GA	35	287
Fulton GA	28	991
Fulton GA	35	0
Fulton GA	36	1,672
Fulton GA	39	0
Fulton GA	36	5
Fulton GA	39	0
Fulton GA	36	0
Fulton GA	39	914
Fulton GA	36	0
Fulton GA	39	6,508

**Political Subdivison Splits Between Districts**

Enacted Senate B-V-C

<b>County</b>	<b>District</b>	<b>Population</b>
Fulton GA	36	0
Fulton GA	39	1,815
Fulton GA	21	0
Fulton GA	48	4,079
Fulton GA	40	0
Fulton GA	56	2,120
Fulton GA	40	0
Fulton GA	56	3,258
Fulton GA	40	0
Fulton GA	56	4,302
Fulton GA	35	53
Fulton GA	39	5,294
Fulton GA	35	14,076
Fulton GA	39	7
Fulton GA	35	4,388
Fulton GA	39	3
Gordon GA	52	730
Gordon GA	54	1,950
Gwinnett GA	9	6,326
Gwinnett GA	55	0
Gwinnett GA	9	9,916
Gwinnett GA	55	0
Gwinnett GA	9	13
Gwinnett GA	41	11,832
Gwinnett GA	9	2,144
Gwinnett GA	41	597
Gwinnett GA	9	0
Gwinnett GA	55	6,264
Gwinnett GA	9	2,296
Gwinnett GA	55	3,412
Gwinnett GA	9	0
Gwinnett GA	55	4,391
Gwinnett GA	45	27
Gwinnett GA	48	9,374
Gwinnett GA	5	4,670
Gwinnett GA	9	303
Gwinnett GA	9	2,677
Gwinnett GA	45	3,198
Gwinnett GA	5	4,472
Gwinnett GA	41	4,639
Gwinnett GA	5	32
Gwinnett GA	40	8,268
Gwinnett GA	5	6,633
Gwinnett GA	48	25
Gwinnett GA	5	8,302
Gwinnett GA	40	4
Gwinnett GA	9	0



**Political Subdivison Splits Between Districts**

Enacted Senate B-V-C

<b>County</b>	<b>District</b>	<b>Population</b>
Gwinnett GA	55	6,339
Gwinnett GA	9	0
Gwinnett GA	55	7,169
Gwinnett GA	9	1,298
Gwinnett GA	45	7,338
Gwinnett GA	45	2,772
Gwinnett GA	48	0
Gwinnett GA	45	5,275
Gwinnett GA	48	0
Hall GA	49	0
Hall GA	50	1,826
Hall GA	49	9,795
Hall GA	50	4,554
Houston GA	18	7,590
Houston GA	20	6,770
Houston GA	26	1,031
Houston GA	18	3,279
Houston GA	26	169
Houston GA	18	1,964
Houston GA	20	4,561
Houston GA	26	11,273
Houston GA	18	3,577
Houston GA	20	5,541
Jackson GA	47	7,583
Jackson GA	50	16,800
Muscogee GA	15	4,114
Muscogee GA	29	5,033
Muscogee GA	15	5,139
Muscogee GA	29	2,784
Muscogee GA	15	6,170
Muscogee GA	29	1,870
Paulding GA	30	7,586
Paulding GA	31	2,162
Paulding GA	30	8,647
Paulding GA	31	5,349
Richmond GA	22	0
Richmond GA	23	1,114
Richmond GA	22	0
Richmond GA	23	2,013
Richmond GA	22	0
Richmond GA	23	4,853
Richmond GA	22	23
Richmond GA	23	3,807
Sumter GA	12	153
Sumter GA	13	2,528
Sumter GA	12	6,105
Sumter GA	13	12

**Political Subdivison Splits Between Districts**

Enacted Senate B-V-C

<b>County</b>	<b>District</b>	<b>Population</b>
Sumter GA	12	5,204
Sumter GA	13	422
Tattnall GA	4	21
Tattnall GA	19	1,671
Tattnall GA	4	1,708
Tattnall GA	19	3,368
Thomas GA	8	3,208
Thomas GA	11	11
Thomas GA	8	8
Thomas GA	11	2,823
Wilcox GA	7	1,245
Wilcox GA	13	335

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# EXHIBIT T-3

RETRIEVED FROM DEMOCRACYDOCKET.COM

User:

Plan Name: **GA\_senate\_DRA**Plan Type: **Senate**

## Political Subdivison Splits Between Districts

Thursday, January 6, 2022

1:46 PM

### Split Counts

Number of subdivisions split into more than one district: Number of splits involving no population:

County	32	County	3
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Number of times a subdivision is split into multiple districts:

County	63
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Voting District	60
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County	District	Population
<i>Split Counties:</i>		
Barrow GA	45	39,217
Barrow GA	46	17,116
Barrow GA	47	27,172
Bartow GA	37	11,130
Bartow GA	52	97,771
Bibb GA	18	53,182
Bibb GA	25	15,513
Bibb GA	26	88,651
Chatham GA	1	81,408
Chatham GA	2	190,408
Chatham GA	4	23,475
Cherokee GA	21	109,034
Cherokee GA	32	90,981
Cherokee GA	56	66,605
Clarke GA	46	52,016
Clarke GA	47	76,655
Clayton GA	34	158,608
Clayton GA	44	138,987
Cobb GA	6	92,249
Cobb GA	32	101,467
Cobb GA	33	192,694
Cobb GA	37	181,541
Cobb GA	38	108,305
Cobb GA	56	89,893
Coffee GA	13	19,881
Coffee GA	19	23,211
Columbia GA	23	59,796
Columbia GA	24	96,214
DeKalb GA	10	75,906
DeKalb GA	40	164,997
DeKalb GA	41	183,560
DeKalb GA	42	190,940
DeKalb GA	43	32,212

**Political Subdivison Splits Between Districts**

GA\_senate\_DRA

<b>County</b>	<b>District</b>	<b>Population</b>
DeKalb GA	44	51,049
DeKalb GA	55	65,718
Douglas GA	28	25,889
Douglas GA	30	23,454
Douglas GA	35	94,894
Effingham GA	1	0
Effingham GA	4	64,769
Fayette GA	16	87,134
Fayette GA	34	32,060
Floyd GA	52	85,090
Floyd GA	53	13,494
Forsyth GA	27	190,676
Forsyth GA	48	60,607
Fulton GA	6	99,152
Fulton GA	14	192,533
Fulton GA	21	83,538
Fulton GA	28	6,963
Fulton GA	35	97,945
Fulton GA	36	192,282
Fulton GA	38	84,850
Fulton GA	39	191,500
Fulton GA	48	83,219
Fulton GA	56	34,728
Gordon GA	52	7,938
Gordon GA	54	49,606
Gwinnett GA	5	191,921
Gwinnett GA	7	189,709
Gwinnett GA	9	192,915
Gwinnett GA	40	25,547
Gwinnett GA	41	7,463
Gwinnett GA	45	151,475
Gwinnett GA	46	27,298
Gwinnett GA	48	46,297
Gwinnett GA	55	124,437
Hall GA	49	189,355
Hall GA	50	13,781
Henry GA	10	116,992
Henry GA	17	82,287
Henry GA	25	41,433
Houston GA	18	42,875
Houston GA	20	74,275
Houston GA	26	46,483
Jackson GA	47	56,660
Jackson GA	50	19,247
Lowndes GA	8	118,251
Lowndes GA	11	0
Macon GA	12	0



**Political Subdivison Splits Between Districts**

GA\_senate\_DRA

<b>County</b>	<b>District</b>	<b>Population</b>
Macon GA	15	12,082
Muscogee GA	15	142,205
Muscogee GA	29	64,717
Newton GA	17	45,536
Newton GA	43	66,947
Paulding GA	30	18,954
Paulding GA	31	149,707
Richmond GA	22	193,163
Richmond GA	23	13,444
Walton GA	17	44,590
Walton GA	46	52,083
Ware GA	3	10,431
Ware GA	8	25,820
White GA	50	12,642
White GA	51	15,361
<i>Split VTDs:</i>		
Bibb GA	18	5,912
Bibb GA	25	31
Bibb GA	18	5,445
Bibb GA	25	0
Bibb GA	26	0
Bibb GA	18	12,640
Bibb GA	25	14
Bibb GA	18	267
Bibb GA	25	2,103
Bibb GA	18	7,940
Bibb GA	26	0
Chatham GA	1	4,099
Chatham GA	4	755
Chatham GA	1	5,330
Chatham GA	4	4,407
Chatham GA	2	0
Chatham GA	4	5,207
Clarke GA	46	5,752
Clarke GA	47	4,194
Clarke GA	46	2,971
Clarke GA	47	2,036
Cobb GA	6	6,586
Cobb GA	33	6,310
Cobb GA	38	505
Cobb GA	32	3,771
Cobb GA	37	2,099
Cobb GA	32	1,471
Cobb GA	37	2,972
Cobb GA	32	3,439
Cobb GA	33	5,460
Cobb GA	6	0

**Political Subdivison Splits Between Districts**

GA\_senate\_DRA

<b>County</b>	<b>District</b>	<b>Population</b>
Cobb GA	33	4,334
Cobb GA	6	3,022
Cobb GA	32	1,532
Cobb GA	33	0
Cobb GA	6	993
Cobb GA	33	5,918
Cobb GA	6	2,398
Cobb GA	38	3,728
Cobb GA	33	7,049
Cobb GA	38	752
Cobb GA	33	12,988
Cobb GA	37	0
Cobb GA	6	4,963
Cobb GA	33	464
Cobb GA	6	5,051
Cobb GA	33	1,886
Cobb GA	6	4,624
Cobb GA	38	5,019
Coffee GA	13	12,595
Coffee GA	19	15,976
DeKalb GA	41	2,963
DeKalb GA	55	0
Douglas GA	30	3,762
Douglas GA	35	0
Effingham GA	1	0
Effingham GA	4	2,105
Floyd GA	52	1,024
Floyd GA	53	7,817
Forsyth GA	27	15,216
Forsyth GA	48	10,302
Forsyth GA	27	24,894
Forsyth GA	48	964
Fulton GA	36	1,954
Fulton GA	39	0
Fulton GA	21	2,971
Fulton GA	56	4,750
Fulton GA	21	4,274
Fulton GA	56	3,958
Fulton GA	35	223
Fulton GA	39	5,124
Fulton GA	35	1,852
Fulton GA	39	521
Gordon GA	52	1,641
Gordon GA	54	996
Gordon GA	52	888
Gordon GA	54	0
Gwinnett GA	45	2,699

**Political Subdivison Splits Between Districts**

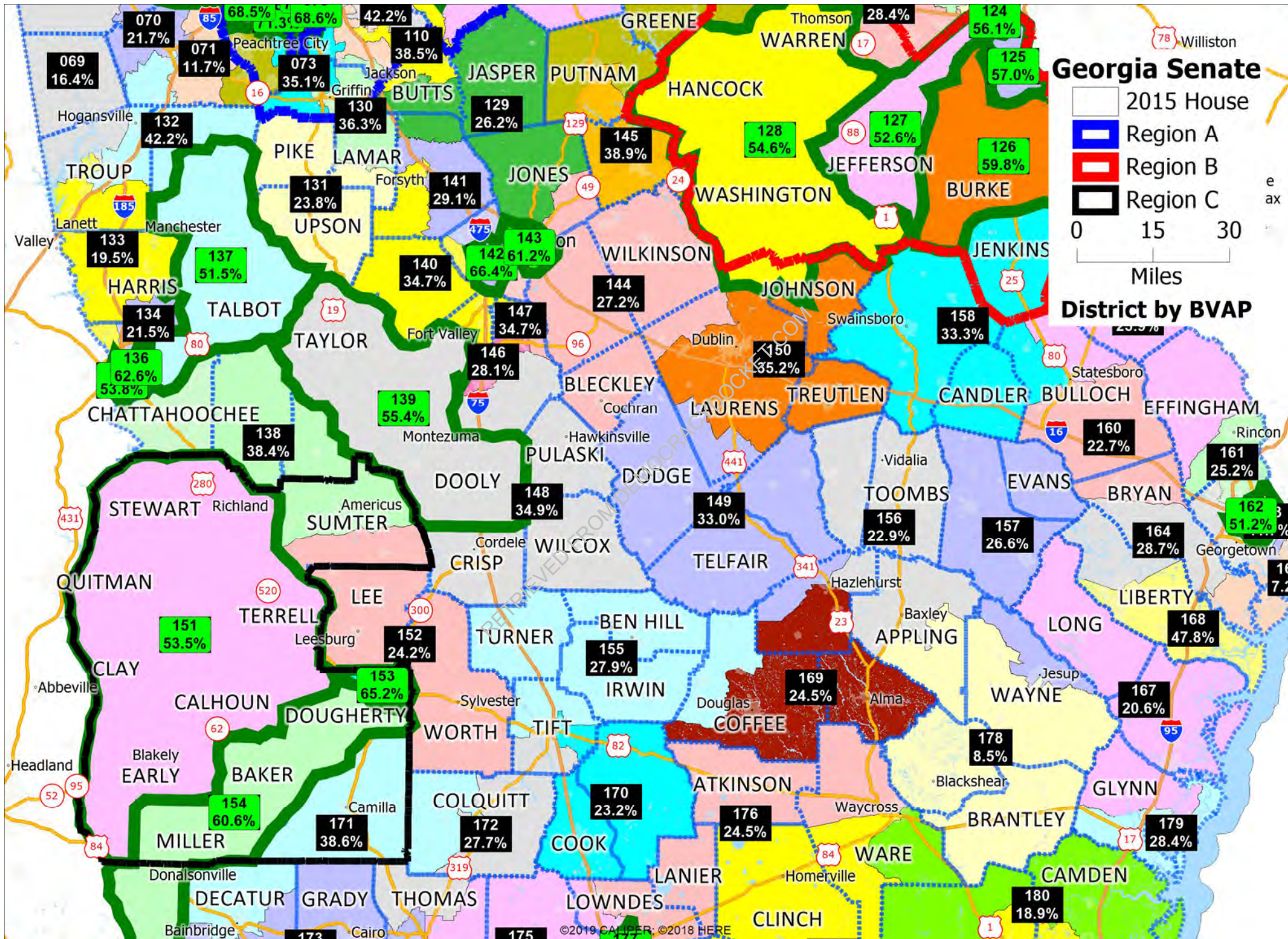
GA\_senate\_DRA

<b>County</b>	<b>District</b>	<b>Population</b>
Gwinnett GA	46	4,613
Gwinnett GA	5	2,075
Gwinnett GA	9	1,386
Gwinnett GA	5	5,605
Gwinnett GA	7	2,701
Hall GA	49	5,135
Hall GA	50	1,735
Hall GA	49	4,129
Hall GA	50	10,220
Houston GA	18	5,178
Houston GA	20	8,151
Houston GA	18	3,625
Houston GA	20	9,869
Houston GA	20	0
Houston GA	26	17,798
Jackson GA	47	24,383
Jackson GA	50	0
Jackson GA	47	0
Jackson GA	50	19,247
Lowndes GA	8	7,212
Lowndes GA	11	0
Macon GA	12	0
Macon GA	15	3,614
Muscogee GA	15	6,919
Muscogee GA	29	2,228
Newton GA	17	2,971
Newton GA	43	0
Paulding GA	30	7,586
Paulding GA	31	2,162
Paulding GA	30	475
Paulding GA	31	12,958
Ware GA	3	2,672
Ware GA	8	3,692
Ware GA	3	0
Ware GA	8	4,133
Ware GA	3	0
Ware GA	8	2,107
Ware GA	3	4,626
Ware GA	8	406

# EXHIBIT U

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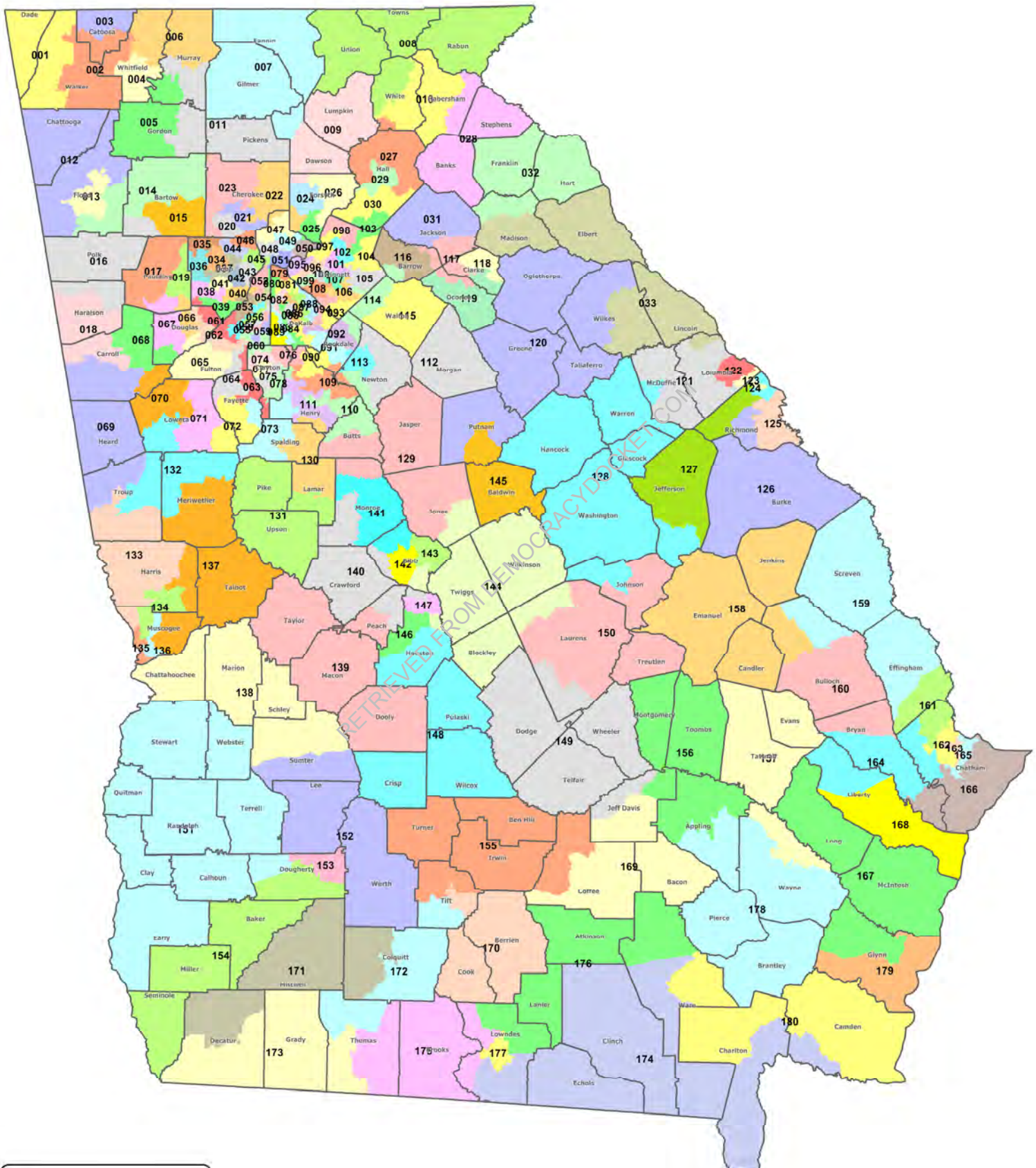






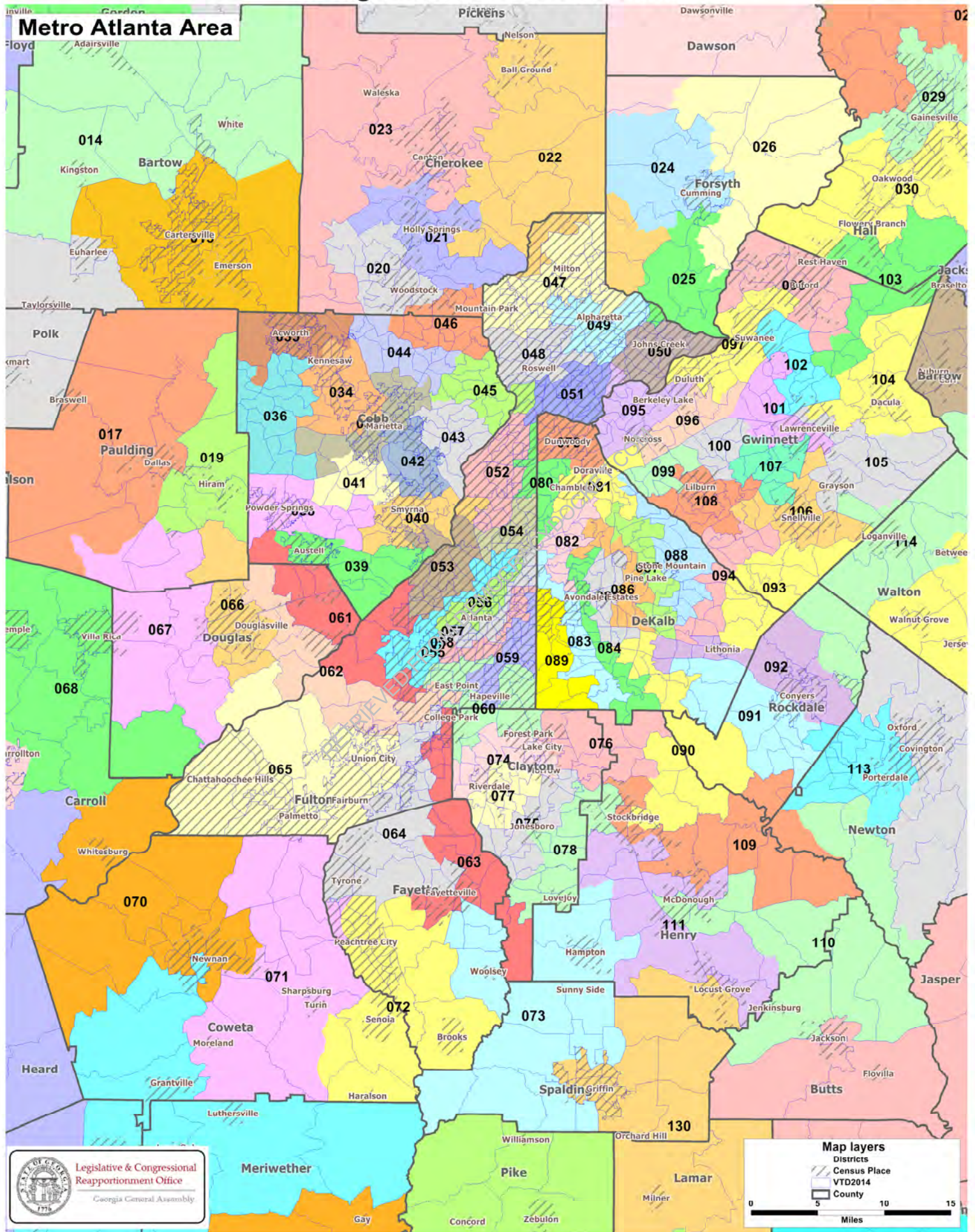
# EXHIBIT V-1

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**Georgia House Districts- 2015**

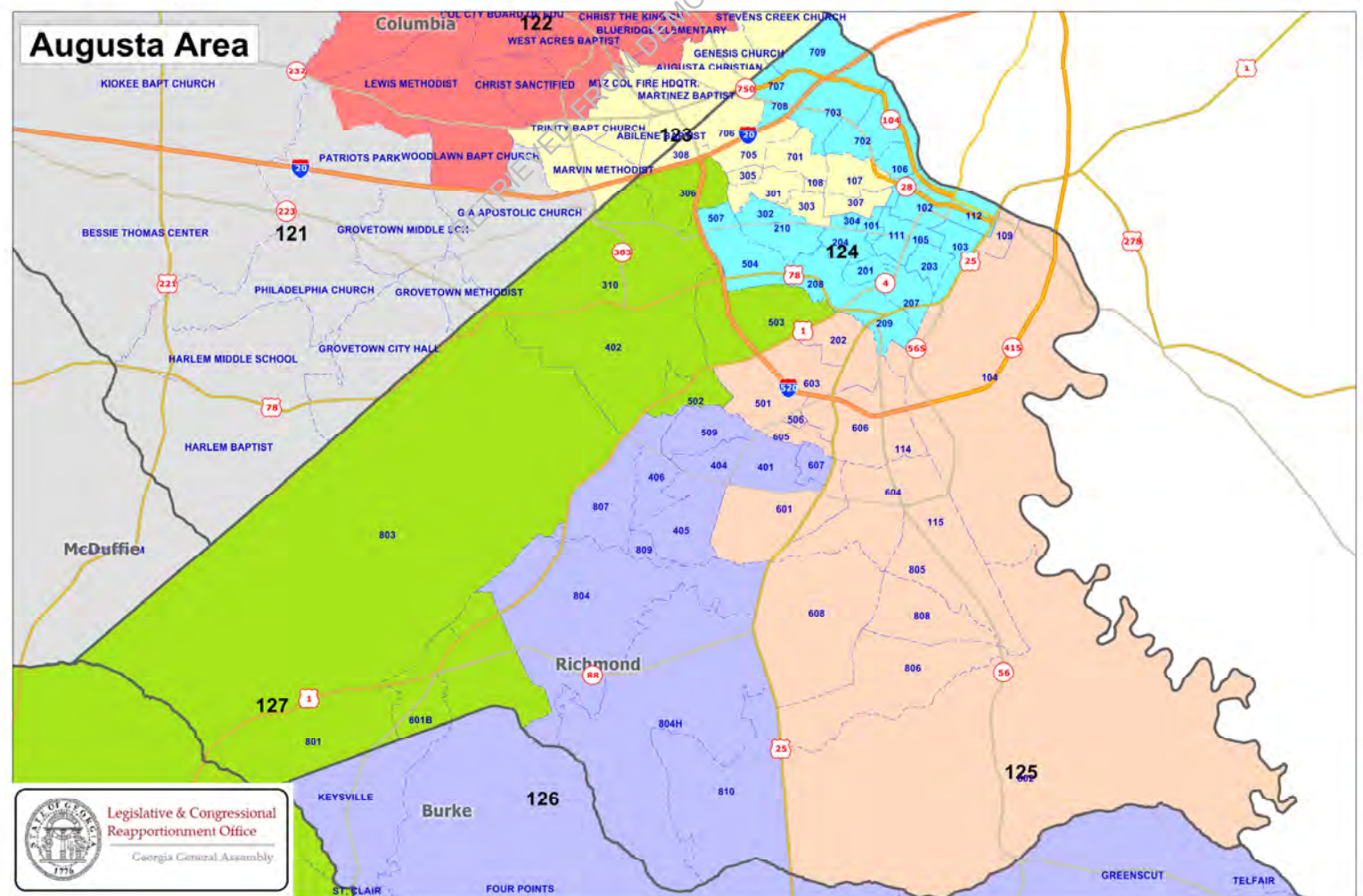


## Georgia House Districts- 2015



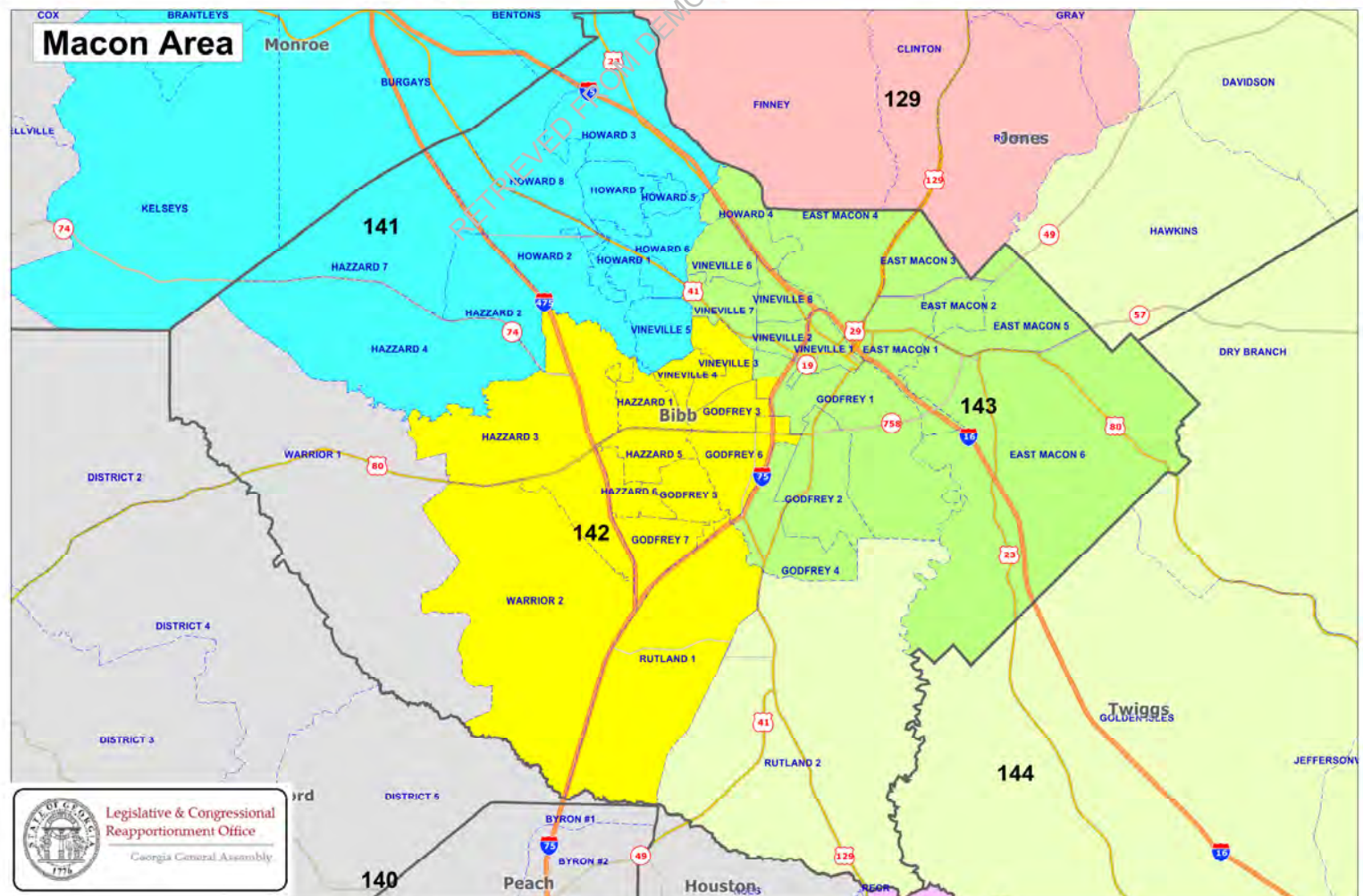


## Savannah Area





### Columbus Area





Plan Name: **House15**Plan Type : **State**User: **Gina**Administrator: **House**

DISTRICT	POPULATION	DEVIATION	% DEVIATION	BLACK	% BLACK	BLACK COMBO	TOTAL BLACK	%TOTAL BLACK	HISP. OR LATINO	%HISP
001	53,612	-208	-0.39%	1,535	2.86%	262	1,797	3.35%	908	1.69%
VAP	41,298			1,115	2.70%	51	1,166	2.82%	539	1.31%
002	53,910	90	0.17%	1,946	3.61%	365	2,311	4.29%	1,772	3.29%
VAP	40,653			1,515	3.73%	68	1,583	3.89%	1,029	2.53%
003	53,366	-454	-0.84%	1,233	2.31%	356	1,589	2.98%	1,231	2.31%
VAP	40,240			837	2.08%	78	915	2.27%	739	1.84%
004	54,120	300	0.56%	2,526	4.67%	371	2,897	5.35%	22,063	40.77%
VAP	38,389			1,959	5.10%	108	2,067	5.38%	12,869	33.52%
005	53,589	-231	-0.43%	1,907	3.56%	378	2,285	4.26%	7,921	14.78%
VAP	38,998			1,439	3.69%	114	1,553	3.98%	4,695	12.04%
006	53,968	148	0.27%	1,079	2.00%	302	1,381	2.56%	11,676	21.64%
VAP	38,578			732	1.90%	80	812	2.10%	6,563	17.01%
007	54,058	238	0.44%	220	0.41%	109	329	0.61%	3,141	5.81%
VAP	43,050			145	0.34%	35	180	0.42%	1,876	4.36%
008	53,905	85	0.16%	341	0.63%	102	443	0.82%	2,111	3.92%
VAP	43,921			225	0.51%	38	263	0.60%	1,367	3.11%
009	54,289	469	0.87%	484	0.89%	229	713	1.31%	2,405	4.43%
VAP	41,849			385	0.92%	77	462	1.10%	1,538	3.68%
010	53,428	-392	-0.73%	1,709	3.20%	276	1,985	3.72%	5,147	9.63%
VAP	40,720			1,451	3.56%	59	1,510	3.71%	2,880	7.07%
011	53,610	-210	-0.39%	547	1.02%	182	729	1.36%	3,485	6.50%
VAP	40,794			397	0.97%	37	434	1.06%	1,979	4.85%
012	54,317	497	0.92%	4,835	8.90%	401	5,236	9.64%	3,021	5.56%
VAP	41,793			3,800	9.09%	93	3,893	9.31%	1,792	4.29%
013	53,445	-375	-0.70%	10,927	20.45%	530	11,457	21.44%	6,711	12.56%
VAP	40,153			7,827	19.49%	148	7,975	19.86%	4,030	10.04%
014	53,527	-293	-0.54%	3,436	6.42%	324	3,760	7.02%	2,658	4.97%
VAP	39,442			2,482	6.29%	74	2,556	6.48%	1,530	3.88%
015	53,473	-347	-0.64%	6,982	13.06%	515	7,497	14.02%	4,980	9.31%
VAP	39,649			4,875	12.30%	114	4,989	12.58%	2,965	7.48%

Plan Name: **House15**Plan Type : **State**User: **Gina**Administrator: **House**

DISTRICT	POPULATION	DEVIATION	% DEVIATION	BLACK	% BLACK	BLACK COMBO	TOTAL BLACK	%TOTAL BLACK	HISP. OR LATINO	%HISP
016	53,926	106	0.20%	5,762	10.69%	421	6,183	11.47%	5,275	9.78%
VAP	39,416			4,022	10.20%	76	4,098	10.40%	2,989	7.58%
017	54,036	216	0.40%	7,427	13.74%	625	8,052	14.90%	2,553	4.72%
VAP	37,564			4,737	12.61%	204	4,941	13.15%	1,447	3.85%
018	53,682	-138	-0.26%	8,806	16.40%	661	9,467	17.64%	3,420	6.37%
VAP	40,084			6,453	16.10%	175	6,628	16.54%	2,178	5.43%
019	54,164	344	0.64%	9,875	18.23%	678	10,553	19.48%	3,119	5.76%
VAP	38,287			6,514	17.01%	219	6,733	17.59%	1,858	4.85%
020	53,679	-141	-0.26%	3,952	7.36%	515	4,467	8.32%	4,742	8.83%
VAP	38,519			2,661	6.91%	171	2,832	7.35%	2,952	7.66%
021	54,040	220	0.41%	2,842	5.26%	407	3,249	6.01%	5,000	9.25%
VAP	38,275			1,851	4.84%	118	1,969	5.14%	3,078	8.04%
022	54,090	270	0.50%	1,937	3.58%	304	2,241	4.14%	4,320	7.99%
VAP	38,675			1,318	3.41%	116	1,434	3.71%	2,747	7.10%
023	53,852	32	0.06%	3,248	6.03%	470	3,718	6.90%	7,412	13.76%
VAP	39,892			2,195	5.50%	150	2,345	5.88%	4,660	11.68%
024	54,284	464	0.86%	1,329	2.45%	249	1,578	2.91%	6,376	11.75%
VAP	38,393			884	2.30%	85	969	2.52%	4,020	10.47%
025	54,157	337	0.63%	1,888	3.49%	257	2,145	3.96%	3,338	6.16%
VAP	35,375			1,247	3.53%	92	1,339	3.79%	2,066	5.84%
026	54,311	491	0.91%	910	1.68%	206	1,116	2.05%	4,267	7.86%
VAP	38,827			608	1.57%	63	671	1.73%	2,632	6.78%
027	53,326	-494	-0.92%	1,741	3.26%	293	2,034	3.81%	7,710	14.46%
VAP	39,263			1,254	3.19%	62	1,316	3.35%	4,404	11.22%
028	53,438	-382	-0.71%	3,399	6.36%	387	3,786	7.08%	2,351	4.40%
VAP	40,671			2,532	6.23%	72	2,604	6.40%	1,370	3.37%
029	53,527	-293	-0.54%	6,698	12.51%	421	7,119	13.30%	23,417	43.75%
VAP	37,452			4,682	12.50%	145	4,827	12.89%	13,600	36.31%
030	53,787	-33	-0.06%	3,993	7.42%	317	4,310	8.01%	13,870	25.79%
VAP	39,178			2,920	7.45%	97	3,017	7.70%	8,081	20.63%

Plan Name: **House15**Plan Type : **State**User: **Gina**Administrator: **House**

DISTRICT	POPULATION	DEVIATION	% DEVIATION	BLACK	% BLACK	BLACK COMBO	TOTAL BLACK	%TOTAL BLACK	HISP. OR LATINO	%HISP
031	53,585	-235	-0.44%	3,447	6.43%	387	3,834	7.15%	3,171	5.92%
VAP	39,241			2,497	6.36%	99	2,596	6.62%	1,929	4.92%
032	54,017	197	0.37%	6,708	12.42%	399	7,107	13.16%	1,802	3.34%
VAP	41,866			4,949	11.82%	82	5,031	12.02%	1,117	2.67%
033	53,537	-283	-0.53%	11,492	21.47%	272	11,764	21.97%	2,153	4.02%
VAP	41,192			8,525	20.70%	94	8,619	20.92%	1,275	3.10%
034	54,162	342	0.64%	9,819	18.13%	697	10,516	19.42%	4,900	9.05%
VAP	41,682			6,949	16.67%	317	7,266	17.43%	3,186	7.64%
035	53,394	-426	-0.79%	11,690	21.89%	730	12,420	23.26%	5,164	9.67%
VAP	37,954			7,649	20.15%	268	7,917	20.86%	3,263	8.60%
036	54,192	372	0.69%	6,790	12.53%	357	7,147	13.19%	2,318	4.28%
VAP	37,923			4,407	11.62%	133	4,540	11.97%	1,410	3.72%
037	54,233	413	0.77%	11,949	22.03%	700	12,649	23.32%	9,293	17.14%
VAP	40,849			8,494	20.79%	319	8,813	21.57%	5,939	14.54%
038	53,921	101	0.19%	24,203	44.89%	981	25,184	46.71%	6,021	11.17%
VAP	39,397			16,271	41.30%	406	16,677	42.33%	3,615	9.18%
039	54,192	372	0.69%	28,547	52.68%	924	29,471	54.38%	10,021	18.49%
VAP	38,182			19,598	51.33%	409	20,007	52.40%	6,010	15.74%
040	53,978	158	0.29%	11,978	22.19%	684	12,662	23.46%	3,223	5.97%
VAP	43,428			8,956	20.62%	340	9,296	21.41%	2,256	5.19%
041	54,148	328	0.61%	19,890	36.73%	1,013	20,903	38.60%	16,357	30.21%
VAP	38,676			13,816	35.72%	472	14,288	36.94%	9,798	25.33%
042	53,894	74	0.14%	21,005	38.97%	1,198	22,203	41.20%	14,955	27.75%
VAP	40,861			15,784	38.63%	609	16,393	40.12%	9,487	23.22%
043	53,969	149	0.28%	8,238	15.26%	525	8,763	16.24%	3,174	5.88%
VAP	42,593			6,228	14.62%	280	6,508	15.28%	2,300	5.40%
044	53,480	-340	-0.63%	6,539	12.23%	575	7,114	13.30%	4,140	7.74%
VAP	40,695			4,636	11.39%	216	4,852	11.92%	2,721	6.69%
045	53,969	149	0.28%	4,550	8.43%	355	4,905	9.09%	2,460	4.56%
VAP	40,117			3,547	8.84%	170	3,717	9.27%	1,647	4.11%

Plan Name: **House15**Plan Type : **State**User: **Gina**Administrator: **House**

DISTRICT	POPULATION	DEVIATION	% DEVIATION	BLACK	% BLACK	BLACK COMBO	TOTAL BLACK	%TOTAL BLACK	HISP. OR LATINO	%HISP
046	53,712	-108	-0.20%	3,695	6.88%	489	4,184	7.79%	4,126	7.68%
VAP	39,868			2,628	6.59%	175	2,803	7.03%	2,715	6.81%
047	54,102	282	0.52%	4,362	8.06%	473	4,835	8.94%	2,934	5.42%
VAP	38,241			2,977	7.78%	189	3,166	8.28%	1,933	5.05%
048	53,832	12	0.02%	6,997	13.00%	585	7,582	14.08%	13,049	24.24%
VAP	40,207			4,882	12.14%	277	5,159	12.83%	8,433	20.97%
049	53,609	-211	-0.39%	5,368	10.01%	473	5,841	10.90%	3,993	7.45%
VAP	38,077			3,781	9.93%	197	3,978	10.45%	2,552	6.70%
050	53,486	-334	-0.62%	5,240	9.80%	459	5,699	10.66%	2,773	5.18%
VAP	36,917			3,406	9.23%	171	3,577	9.69%	1,768	4.79%
051	53,630	-190	-0.35%	11,461	21.37%	816	12,277	22.89%	5,150	9.60%
VAP	41,035			8,478	20.66%	412	8,890	21.66%	3,437	8.38%
052	53,458	-362	-0.67%	6,576	12.30%	576	7,152	13.38%	8,262	15.46%
VAP	41,106			5,215	12.69%	326	5,541	13.48%	5,325	12.95%
053	53,497	-323	-0.60%	33,213	62.08%	652	33,865	63.30%	4,481	8.38%
VAP	39,576			23,676	59.82%	394	24,070	60.82%	2,924	7.39%
054	53,576	-244	-0.45%	6,132	11.45%	454	6,586	12.29%	4,581	8.55%
VAP	44,566			5,448	12.22%	306	5,754	12.91%	3,405	7.64%
055	53,842	22	0.04%	37,621	69.87%	743	38,364	71.25%	1,482	2.75%
VAP	43,597			29,543	67.76%	505	30,048	68.92%	1,174	2.69%
056	53,564	-256	-0.48%	31,024	57.92%	780	31,804	59.38%	1,832	3.42%
VAP	46,750			25,255	54.02%	631	25,886	55.37%	1,619	3.46%
057	54,205	385	0.72%	30,771	56.77%	671	31,442	58.01%	2,798	5.16%
VAP	45,178			24,643	54.55%	534	25,177	55.73%	2,120	4.69%
058	53,635	-185	-0.34%	32,345	60.31%	748	33,093	61.70%	2,092	3.90%
VAP	44,854			25,212	56.21%	562	25,774	57.46%	1,733	3.86%
059	53,372	-448	-0.83%	28,660	53.70%	674	29,334	54.96%	6,170	11.56%
VAP	40,952			20,482	50.01%	391	20,873	50.97%	4,253	10.39%
060	53,677	-143	-0.27%	38,767	72.22%	730	39,497	73.58%	7,554	14.07%
VAP	38,830			27,858	71.74%	403	28,261	72.78%	4,662	12.01%

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DISTRICT	POPULATION	DEVIATION	% DEVIATION	BLACK	% BLACK	BLACK COMBO	TOTAL BLACK	%TOTAL BLACK	HISP. OR LATINO	%HISP
061	54,224	404	0.75%	38,149	70.35%	875	39,024	71.97%	4,493	8.29%
VAP	39,023			27,018	69.24%	402	27,420	70.27%	2,640	6.77%
062	53,740	-80	-0.15%	38,133	70.96%	954	39,087	72.73%	2,553	4.75%
VAP	38,345			26,396	68.84%	454	26,850	70.02%	1,522	3.97%
063	53,547	-273	-0.51%	35,269	65.87%	810	36,079	67.38%	2,278	4.25%
VAP	39,038			24,804	63.54%	398	25,202	64.56%	1,487	3.81%
064	53,952	132	0.25%	33,817	62.68%	799	34,616	64.16%	3,109	5.76%
VAP	39,190			23,598	60.21%	406	24,004	61.25%	1,841	4.70%
065	54,298	478	0.89%	38,285	70.51%	894	39,179	72.16%	4,408	8.12%
VAP	37,616			25,584	68.01%	425	26,009	69.14%	2,626	6.98%
066	54,130	310	0.58%	23,094	42.66%	876	23,970	44.28%	3,639	6.72%
VAP	38,363			15,162	39.52%	338	15,500	40.40%	2,217	5.78%
067	54,230	410	0.76%	11,110	20.49%	630	11,740	21.65%	3,037	5.60%
VAP	38,436			7,300	18.99%	230	7,530	19.59%	1,790	4.66%
068	54,226	406	0.75%	8,853	16.33%	678	9,531	17.58%	2,456	4.53%
VAP	38,995			5,909	15.15%	165	6,074	15.58%	1,474	3.78%
069	54,158	338	0.63%	7,255	13.40%	470	7,725	14.26%	1,818	3.36%
VAP	41,364			5,633	13.62%	138	5,771	13.95%	1,129	2.73%
070	54,341	521	0.97%	10,838	19.94%	542	11,380	20.94%	3,742	6.89%
VAP	40,088			7,608	18.98%	163	7,771	19.38%	2,460	6.14%
071	54,165	345	0.64%	5,449	10.06%	407	5,856	10.81%	3,399	6.28%
VAP	38,886			3,933	10.11%	146	4,079	10.49%	2,144	5.51%
072	53,807	-13	-0.02%	3,588	6.67%	351	3,939	7.32%	3,036	5.64%
VAP	38,955			2,461	6.32%	113	2,574	6.61%	1,913	4.91%
073	53,951	131	0.24%	14,857	27.54%	639	15,496	28.72%	2,621	4.86%
VAP	39,535			9,970	25.22%	208	10,178	25.74%	1,646	4.16%
074	53,401	-419	-0.78%	34,347	64.32%	850	35,197	65.91%	8,406	15.74%
VAP	38,810			24,808	63.92%	463	25,271	65.11%	5,259	13.55%
075	53,930	110	0.20%	36,879	68.38%	1,054	37,933	70.34%	5,741	10.65%
VAP	38,464			25,611	66.58%	483	26,094	67.84%	3,446	8.96%



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DISTRICT	POPULATION	DEVIATION	% DEVIATION	BLACK	% BLACK	BLACK COMBO	TOTAL BLACK	%TOTAL BLACK	HISP. OR LATINO	%HISP
076	53,288	-532	-0.99%	34,414	64.58%	786	35,200	66.06%	4,951	9.29%
VAP	38,157			23,894	62.62%	357	24,251	63.56%	3,019	7.91%
077	53,704	-116	-0.22%	37,203	69.27%	910	38,113	70.97%	8,525	15.87%
VAP	37,349			25,612	68.57%	433	26,045	69.73%	5,151	13.79%
078	53,616	-204	-0.38%	31,896	59.49%	1,108	33,004	61.56%	5,790	10.80%
VAP	38,129			21,597	56.64%	494	22,091	57.94%	3,625	9.51%
079	53,714	-106	-0.20%	7,883	14.68%	510	8,393	15.63%	7,608	14.16%
VAP	41,179			6,289	15.27%	320	6,609	16.05%	5,275	12.81%
080	53,535	-285	-0.53%	6,054	11.31%	457	6,511	12.16%	11,065	20.67%
VAP	43,496			5,068	11.65%	316	5,384	12.38%	7,674	17.64%
081	53,590	-230	-0.43%	5,687	10.61%	493	6,180	11.53%	20,956	39.10%
VAP	41,186			4,247	10.31%	271	4,518	10.97%	14,601	35.45%
082	53,564	-256	-0.48%	7,969	14.88%	525	8,494	15.86%	12,180	22.74%
VAP	43,727			6,815	15.59%	355	7,170	16.40%	8,522	19.49%
083	53,652	-168	-0.31%	33,705	62.82%	571	34,276	63.89%	1,467	2.73%
VAP	41,089			24,998	60.84%	328	25,326	61.64%	1,023	2.49%
084	53,650	-170	-0.32%	32,938	61.39%	585	33,523	62.48%	1,284	2.39%
VAP	41,782			24,546	58.75%	341	24,887	59.56%	907	2.17%
085	54,195	375	0.70%	32,012	59.07%	793	32,805	60.53%	1,954	3.61%
VAP	41,110			23,561	57.31%	440	24,001	58.38%	1,360	3.31%
086	53,878	58	0.11%	33,655	62.47%	737	34,392	63.83%	2,214	4.11%
VAP	40,880			24,798	60.66%	427	25,225	61.70%	1,490	3.64%
087	54,104	284	0.53%	36,835	68.08%	837	37,672	69.63%	3,125	5.78%
VAP	40,610			26,585	65.46%	449	27,034	66.57%	2,190	5.39%
088	54,194	374	0.69%	34,637	63.91%	979	35,616	65.72%	6,361	11.74%
VAP	40,173			24,669	61.41%	586	25,255	62.87%	4,198	10.45%
089	53,838	18	0.03%	34,951	64.92%	637	35,588	66.10%	1,503	2.79%
VAP	42,011			26,139	62.22%	361	26,500	63.08%	1,071	2.55%
090	53,620	-200	-0.37%	36,611	68.28%	714	37,325	69.61%	1,408	2.63%
VAP	39,580			26,443	66.81%	399	26,842	67.82%	864	2.18%

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091	54,022	202	0.38%	35,420	65.57%	811	36,231	67.07%	2,175	4.03%
VAP	39,377			24,512	62.25%	415	24,927	63.30%	1,384	3.51%
092	54,205	385	0.72%	36,762	67.82%	776	37,538	69.25%	6,562	12.11%
VAP	38,475			25,431	66.10%	381	25,812	67.09%	4,018	10.44%
093	54,333	513	0.95%	36,227	66.68%	1,104	37,331	68.71%	3,671	6.76%
VAP	37,658			24,013	63.77%	494	24,507	65.08%	2,177	5.78%
094	53,570	-250	-0.46%	36,237	67.64%	995	37,232	69.50%	3,550	6.63%
VAP	38,031			24,673	64.88%	481	25,154	66.14%	2,148	5.65%
095	54,289	469	0.87%	11,420	21.04%	715	12,135	22.35%	8,319	15.32%
VAP	39,953			7,981	19.98%	367	8,348	20.89%	5,381	13.47%
096	53,962	142	0.26%	10,302	19.09%	786	11,088	20.55%	18,505	34.29%
VAP	39,523			7,170	18.14%	352	7,522	19.03%	11,993	30.34%
097	53,821	1	0.00%	5,908	10.98%	505	6,413	11.92%	5,064	9.41%
VAP	38,410			3,878	10.10%	189	4,067	10.59%	3,202	8.34%
098	53,671	-149	-0.28%	6,717	12.52%	553	7,270	13.55%	8,695	16.20%
VAP	37,068			4,376	11.81%	169	4,545	12.26%	5,260	14.19%
099	53,673	-147	-0.27%	11,385	21.21%	760	12,145	22.63%	29,958	55.82%
VAP	37,254			8,028	21.55%	352	8,380	22.49%	19,276	51.74%
100	53,679	-141	-0.26%	17,322	32.27%	1,057	18,379	34.24%	20,465	38.12%
VAP	37,465			11,910	31.79%	452	12,362	33.00%	12,873	34.36%
101	53,747	-73	-0.14%	11,266	20.96%	721	11,987	22.30%	11,208	20.85%
VAP	38,785			7,513	19.37%	300	7,813	20.14%	7,056	18.19%
102	53,770	-50	-0.09%	10,217	19.00%	785	11,002	20.46%	7,262	13.51%
VAP	39,110			7,083	18.11%	353	7,436	19.01%	4,984	12.74%
103	53,533	-287	-0.53%	5,439	10.16%	428	5,867	10.96%	5,619	10.50%
VAP	37,957			3,699	9.75%	144	3,843	10.12%	3,420	9.01%
104	53,774	-46	-0.09%	12,344	22.96%	679	13,023	24.22%	6,730	12.52%
VAP	36,121			7,783	21.55%	244	8,027	22.22%	4,149	11.49%
105	53,542	-278	-0.52%	17,754	33.16%	819	18,573	34.69%	6,527	12.19%
VAP	36,449			11,266	30.91%	331	11,597	31.82%	3,945	10.82%

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106	53,473	-347	-0.64%	15,161	28.35%	818	15,979	29.88%	5,451	10.19%
VAP	38,585			9,774	25.33%	319	10,093	26.16%	3,298	8.55%
107	53,368	-452	-0.84%	12,120	22.71%	697	12,817	24.02%	10,021	18.78%
VAP	37,377			7,826	20.94%	295	8,121	21.73%	6,104	16.33%
108	53,549	-271	-0.50%	8,812	16.46%	619	9,431	17.61%	10,315	19.26%
VAP	39,456			5,970	15.13%	265	6,235	15.80%	6,437	16.31%
109	54,153	333	0.62%	16,366	30.22%	681	17,047	31.48%	2,434	4.49%
VAP	38,385			10,881	28.35%	262	11,143	29.03%	1,467	3.82%
110	54,298	478	0.89%	17,021	31.35%	682	17,703	32.60%	2,450	4.51%
VAP	38,485			11,454	29.76%	223	11,677	30.34%	1,472	3.82%
111	54,293	473	0.88%	18,415	33.92%	754	19,169	35.31%	3,217	5.93%
VAP	38,235			12,060	31.54%	293	12,353	32.31%	2,003	5.24%
112	53,657	-163	-0.30%	11,816	22.02%	405	12,221	22.78%	1,664	3.10%
VAP	40,120			8,436	21.03%	116	8,552	21.32%	1,010	2.52%
113	53,670	-150	-0.28%	31,651	58.97%	986	32,637	60.81%	3,129	5.83%
VAP	37,191			20,824	55.99%	390	21,214	57.04%	1,827	4.91%
114	53,571	-249	-0.46%	8,328	15.55%	452	8,780	16.39%	3,148	5.88%
VAP	38,119			5,386	14.13%	180	5,566	14.60%	1,883	4.94%
115	53,559	-261	-0.48%	10,507	19.62%	446	10,953	20.45%	1,482	2.77%
VAP	39,330			7,264	18.47%	122	7,386	18.78%	897	2.28%
116	53,885	65	0.12%	5,611	10.41%	574	6,185	11.48%	4,524	8.40%
VAP	38,935			3,872	9.94%	147	4,019	10.32%	2,691	6.91%
117	54,352	532	0.99%	9,709	17.86%	454	10,163	18.70%	4,069	7.49%
VAP	43,102			7,216	16.74%	183	7,399	17.17%	2,663	6.18%
118	53,858	38	0.07%	18,108	33.62%	557	18,665	34.66%	8,188	15.20%
VAP	42,287			12,713	30.06%	285	12,998	30.74%	5,013	11.85%
119	53,330	-490	-0.91%	6,265	11.75%	333	6,598	12.37%	2,297	4.31%
VAP	43,291			4,884	11.28%	168	5,052	11.67%	1,660	3.83%
120	53,857	37	0.07%	16,605	30.83%	456	17,061	31.68%	2,780	5.16%
VAP	42,036			12,251	29.14%	143	12,394	29.48%	1,722	4.10%

Plan Name: **House15**Plan Type : **State**User: **Gina**Administrator: **House**

DISTRICT	POPULATION	DEVIATION	% DEVIATION	BLACK	% BLACK	BLACK COMBO	TOTAL BLACK	%TOTAL BLACK	HISP. OR LATINO	%HISP
121	54,069	249	0.46%	13,423	24.83%	666	14,089	26.06%	2,902	5.37%
VAP	39,434			9,176	23.27%	181	9,357	23.73%	1,781	4.52%
122	53,789	-31	-0.06%	6,226	11.57%	518	6,744	12.54%	2,262	4.21%
VAP	38,559			4,361	11.31%	184	4,545	11.79%	1,410	3.66%
123	54,305	485	0.90%	9,760	17.97%	599	10,359	19.08%	1,999	3.68%
VAP	41,748			7,090	16.98%	212	7,302	17.49%	1,331	3.19%
124	53,886	66	0.12%	30,939	57.42%	770	31,709	58.84%	2,081	3.86%
VAP	42,242			22,804	53.98%	373	23,177	54.87%	1,469	3.48%
125	54,151	331	0.62%	28,973	53.50%	921	29,894	55.20%	1,676	3.10%
VAP	39,400			19,900	50.51%	339	20,239	51.37%	1,044	2.65%
126	53,613	-207	-0.38%	32,597	60.80%	823	33,420	62.34%	1,876	3.50%
VAP	38,267			22,371	58.46%	340	22,711	59.35%	1,202	3.14%
127	53,672	-148	-0.27%	29,218	54.44%	893	30,111	56.10%	2,937	5.47%
VAP	40,411			20,748	51.34%	418	21,166	52.38%	2,110	5.22%
128	53,559	-261	-0.48%	30,209	56.40%	285	30,494	56.94%	957	1.79%
VAP	41,388			22,575	54.54%	106	22,681	54.80%	714	1.73%
129	53,337	-483	-0.90%	14,381	26.96%	360	14,741	27.64%	1,278	2.40%
VAP	40,449			10,955	27.08%	109	11,064	27.35%	809	2.00%
130	53,697	-123	-0.23%	18,943	35.28%	516	19,459	36.24%	1,881	3.50%
VAP	39,742			13,066	32.88%	199	13,265	33.38%	1,201	3.02%
131	54,163	343	0.64%	13,302	24.56%	383	13,685	25.27%	941	1.74%
VAP	41,142			10,180	24.74%	116	10,296	25.03%	620	1.51%
132	53,756	-64	-0.12%	22,850	42.51%	611	23,461	43.64%	2,993	5.57%
VAP	38,796			15,728	40.54%	150	15,878	40.93%	2,014	5.19%
133	53,564	-256	-0.48%	10,194	19.03%	309	10,503	19.61%	1,442	2.69%
VAP	40,825			7,453	18.26%	104	7,557	18.51%	953	2.33%
134	53,328	-492	-0.91%	8,669	16.26%	693	9,362	17.56%	2,977	5.58%
VAP	40,802			6,422	15.74%	262	6,684	16.38%	1,962	4.81%
135	53,588	-232	-0.43%	30,110	56.19%	1,125	31,235	58.29%	4,186	7.81%
VAP	39,104			21,170	54.14%	443	21,613	55.27%	2,757	7.05%

Plan Name: **House15**Plan Type : **State**User: **Gina**Administrator: **House**

DISTRICT	POPULATION	DEVIATION	% DEVIATION	BLACK	% BLACK	BLACK COMBO	TOTAL BLACK	%TOTAL BLACK	HISP. OR LATINO	%HISP
136	53,614	-206	-0.38%	30,009	55.97%	1,138	31,147	58.09%	3,646	6.80%
VAP	39,806			21,582	54.22%	480	22,062	55.42%	2,387	6.00%
137	53,431	-389	-0.72%	28,843	53.98%	719	29,562	55.33%	1,627	3.05%
VAP	39,957			20,679	51.75%	250	20,929	52.38%	1,047	2.62%
138	53,825	5	0.01%	21,540	40.02%	442	21,982	40.84%	3,609	6.71%
VAP	39,760			15,006	37.74%	177	15,183	38.19%	2,328	5.86%
139	53,594	-226	-0.42%	30,419	56.76%	354	30,773	57.42%	2,853	5.32%
VAP	41,652			23,330	56.01%	204	23,534	56.50%	1,875	4.50%
140	54,060	240	0.45%	17,710	32.76%	493	18,203	33.67%	2,454	4.54%
VAP	41,014			12,871	31.38%	147	13,018	31.74%	1,567	3.82%
141	54,344	524	0.97%	13,277	24.43%	392	13,669	25.15%	1,274	2.34%
VAP	41,154			9,099	22.11%	139	9,238	22.45%	833	2.02%
142	53,493	-327	-0.61%	35,250	65.90%	496	35,746	66.82%	1,517	2.84%
VAP	38,488			24,083	62.57%	203	24,286	63.10%	942	2.45%
143	53,945	125	0.23%	33,332	61.79%	483	33,815	62.68%	1,502	2.78%
VAP	40,592			23,357	57.54%	234	23,591	58.12%	1,014	2.50%
144	53,343	-477	-0.89%	14,930	27.99%	300	15,230	28.55%	1,376	2.58%
VAP	40,553			11,095	27.36%	104	11,199	27.62%	877	2.16%
145	53,485	-335	-0.62%	21,392	40.00%	366	21,758	40.68%	1,251	2.34%
VAP	42,344			15,623	36.90%	115	15,738	37.17%	862	2.04%
146	53,671	-149	-0.28%	13,251	24.69%	608	13,859	25.82%	2,228	4.15%
VAP	38,823			9,286	23.92%	189	9,475	24.41%	1,390	3.58%
147	53,333	-487	-0.90%	15,436	28.94%	829	16,265	30.50%	4,311	8.08%
VAP	39,589			10,438	26.37%	293	10,731	27.11%	2,733	6.90%
148	53,393	-427	-0.79%	19,030	35.64%	322	19,352	36.24%	1,831	3.43%
VAP	40,651			13,743	33.81%	126	13,869	34.12%	1,160	2.85%
149	53,612	-208	-0.39%	17,201	32.08%	322	17,523	32.68%	3,690	6.88%
VAP	41,813			13,187	31.54%	115	13,302	31.81%	2,916	6.97%
150	54,142	322	0.60%	18,753	34.64%	356	19,109	35.29%	1,247	2.30%
VAP	40,188			12,988	32.32%	116	13,104	32.61%	785	1.95%



Plan Name: **House15**Plan Type : **State**User: **Gina**Administrator: **House**

DISTRICT	POPULATION	DEVIATION	% DEVIATION	BLACK	% BLACK	BLACK COMBO	TOTAL BLACK	%TOTAL BLACK	HISP. OR LATINO	%HISP
151	54,071	251	0.47%	29,610	54.76%	313	29,923	55.34%	2,394	4.43%
VAP	41,637			21,454	51.53%	134	21,588	51.85%	2,061	4.95%
152	53,990	170	0.32%	12,855	23.81%	284	13,139	24.34%	1,132	2.10%
VAP	39,824			9,127	22.92%	77	9,204	23.11%	710	1.78%
153	54,116	296	0.55%	33,967	62.77%	490	34,457	63.67%	1,580	2.92%
VAP	40,411			23,848	59.01%	205	24,053	59.52%	1,045	2.59%
154	53,972	152	0.28%	33,354	61.80%	360	33,714	62.47%	862	1.60%
VAP	40,393			23,672	58.60%	178	23,850	59.04%	513	1.27%
155	54,043	223	0.41%	15,240	28.20%	281	15,521	28.72%	2,831	5.24%
VAP	40,679			10,900	26.80%	83	10,983	27.00%	1,681	4.13%
156	53,637	-183	-0.34%	12,233	22.81%	319	12,552	23.40%	4,969	9.26%
VAP	39,399			8,497	21.57%	74	8,571	21.75%	2,899	7.36%
157	54,334	514	0.96%	14,713	27.08%	424	15,137	27.86%	4,887	8.99%
VAP	41,282			11,249	27.25%	118	11,367	27.54%	3,022	7.32%
158	53,861	41	0.08%	18,526	34.40%	315	18,841	34.98%	2,949	5.48%
VAP	40,158			12,947	32.24%	93	13,040	32.47%	1,874	4.67%
159	53,363	-457	-0.85%	15,415	28.89%	402	15,817	29.64%	1,038	1.95%
VAP	39,250			10,779	27.46%	127	10,906	27.79%	620	1.58%
160	53,304	-516	-0.96%	10,997	20.63%	445	11,442	21.47%	1,887	3.54%
VAP	43,070			8,753	20.32%	216	8,969	20.82%	1,351	3.14%
161	53,931	111	0.21%	9,998	18.54%	529	10,527	19.52%	2,617	4.85%
VAP	39,726			7,006	17.64%	179	7,185	18.09%	1,656	4.17%
162	53,981	161	0.30%	27,992	51.86%	803	28,795	53.34%	5,485	10.16%
VAP	39,859			19,383	48.63%	336	19,719	49.47%	3,728	9.35%
163	53,520	-300	-0.56%	28,079	52.46%	530	28,609	53.45%	1,758	3.28%
VAP	42,793			20,228	47.27%	321	20,549	48.02%	1,475	3.45%
164	53,429	-391	-0.73%	13,204	24.71%	1,021	14,225	26.62%	4,381	8.20%
VAP	37,716			8,909	23.62%	333	9,242	24.50%	2,632	6.98%
165	54,351	531	0.99%	30,977	56.99%	701	31,678	58.28%	2,028	3.73%
VAP	41,872			22,491	53.71%	316	22,807	54.47%	1,408	3.36%

Plan Name: **House15**Plan Type : **State**User: **Gina**Administrator: **House**

DISTRICT	POPULATION	DEVIATION	% DEVIATION	BLACK	% BLACK	BLACK COMBO	TOTAL BLACK	%TOTAL BLACK	HISP. OR LATINO	%HISP
166	54,038	218	0.41%	4,275	7.91%	272	4,547	8.41%	1,443	2.67%
VAP	43,168			3,291	7.62%	101	3,392	7.86%	969	2.24%
167	54,342	522	0.97%	12,046	22.17%	583	12,629	23.24%	3,335	6.14%
VAP	40,594			8,684	21.39%	198	8,882	21.88%	2,006	4.94%
168	54,032	212	0.39%	24,420	45.20%	1,531	25,951	48.03%	4,881	9.03%
VAP	38,351			16,808	43.83%	556	17,364	45.28%	2,968	7.74%
169	53,952	132	0.25%	12,331	22.86%	390	12,721	23.58%	5,644	10.46%
VAP	39,735			8,807	22.16%	105	8,912	22.43%	3,339	8.40%
170	53,301	-519	-0.96%	12,065	22.64%	311	12,376	23.22%	3,742	7.02%
VAP	39,206			8,174	20.85%	87	8,261	21.07%	2,166	5.52%
171	54,189	369	0.69%	21,032	38.81%	261	21,293	39.29%	3,444	6.36%
VAP	40,274			14,885	36.96%	87	14,972	37.18%	2,118	5.26%
172	53,287	-533	-0.99%	15,471	29.03%	309	15,780	29.61%	7,770	14.58%
VAP	38,475			10,638	27.65%	108	10,746	27.93%	4,659	12.11%
173	54,287	467	0.87%	19,776	36.43%	330	20,106	37.04%	3,674	6.77%
VAP	40,561			14,138	34.86%	133	14,271	35.18%	2,291	5.65%
174	54,123	303	0.56%	12,704	23.47%	537	13,241	24.46%	3,582	6.62%
VAP	39,946			8,967	22.45%	150	9,117	22.82%	2,218	5.55%
175	53,794	-26	-0.05%	14,166	26.33%	261	14,427	26.82%	2,008	3.73%
VAP	41,150			10,447	25.39%	112	10,559	25.66%	1,306	3.17%
176	54,193	373	0.69%	12,876	23.76%	507	13,383	24.70%	4,129	7.62%
VAP	40,044			9,532	23.80%	167	9,699	24.22%	2,471	6.17%
177	54,095	275	0.51%	29,446	54.43%	637	30,083	55.61%	2,298	4.25%
VAP	41,485			20,793	50.12%	294	21,087	50.83%	1,649	3.97%
178	53,463	-357	-0.66%	4,529	8.47%	273	4,802	8.98%	2,402	4.49%
VAP	40,080			3,528	8.80%	80	3,608	9.00%	1,586	3.96%
179	54,081	261	0.48%	17,476	32.31%	512	17,988	33.26%	3,796	7.02%
VAP	41,101			12,003	29.20%	184	12,187	29.65%	2,455	5.97%
180	53,321	-499	-0.93%	10,316	19.35%	728	11,044	20.71%	2,504	4.70%
VAP	39,225			7,131	18.18%	209	7,340	18.71%	1,577	4.02%

Plan Name: **House15**Plan Type : **State**User: **Gina**Administrator: **House**

DISTRICT	POPULATION	DEVIATION	% DEVIATION	BLACK	% BLACK	BLACK COMBO	TOTAL BLACK	%TOTAL BLACK	HISP. OR LATINO	%HISP
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Total Population: 9,687,653

Ideal Value: 53,820

**Summary Statistics**

Population Range: 53,287 to 54,352

Absolute Overall Range: 1,065

Relative Range: -0.99% to 0.99%

Relative Overall Range: 1.98%

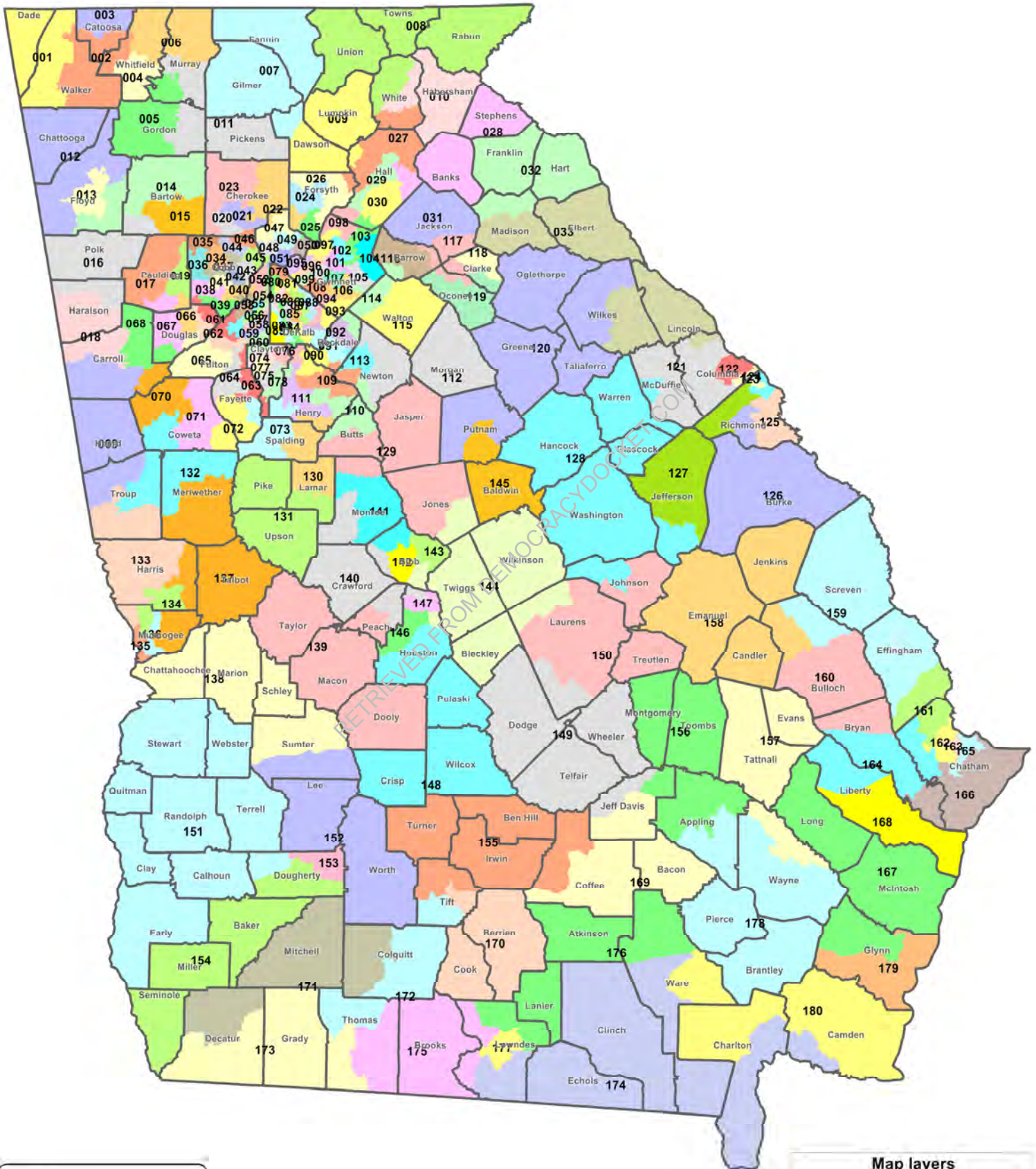
RETRIEVED FROM DEMOCRACYDOCKET.COM

# EXHIBIT V-2

RETRIEVED FROM DEMOCRACYDOCKET.COM

# Proposed Georgia House Districts

Client: H167  
Plan: hseprop1  
Type: House

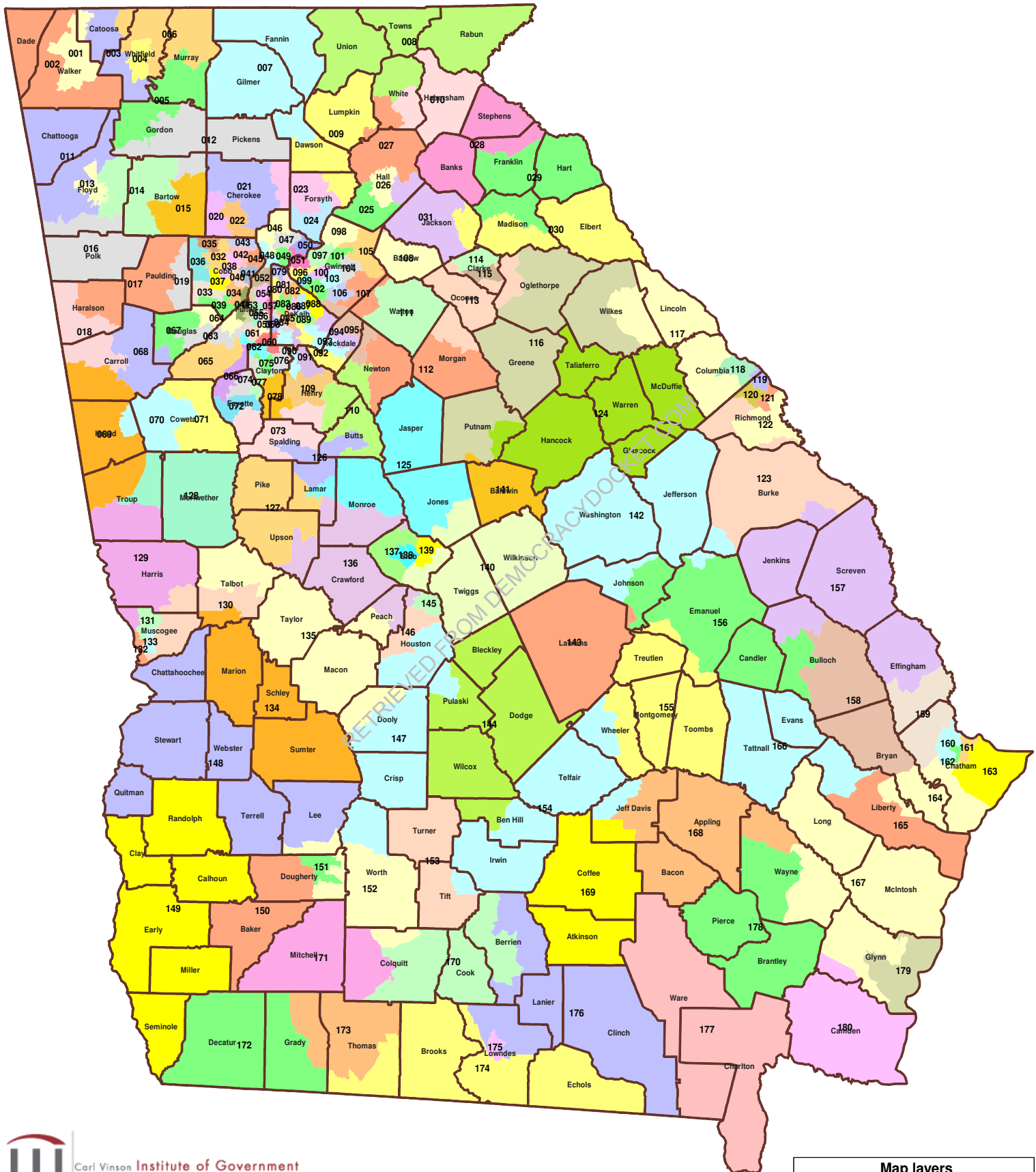




# EXHIBIT V-3

RETRIEVED FROM DEMOCRACYDOCKET.COM

# Georgia House of Representatives: 2006



Carl Vinson **Institute of Government**

The University of Georgia

Georgia Reapportionment Services Office

# EXHIBIT W-1

RETRIEVED FROM DEMOCRACYDOCKET.COM

## Georgia State House --2015 Benchmark Plan

District	2020 Pop.	% 2020 Deviation	18+ Pop	18+ AP Black	% 18+ AP Black	18+ NH White	% 18+ NH White	2015-19 BCVAP*	2015-19 LCVAP*	2015-19 ACVAP*	2015-19 B+L+A CVAP*	2015-19 NH White CVAP*
001	52750	-11.36%	41428	1491	3.60%	37,296	90.03%	3.12%	1.44%	0.59%	5.17%	93.52%
002	53650	-9.85%	41669	1496	3.59%	37,190	89.25%	4.39%	1.99%	0.80%	6.67%	92.50%
003	56969	-4.27%	44216	1530	3.46%	39,063	88.35%	3.11%	1.85%	1.37%	6.39%	92.48%
004	54825	-7.87%	40064	2291	5.72%	20,316	50.71%	6.52%	22.42%	1.01%	30.23%	68.43%
005	55351	-6.99%	41677	1856	4.45%	32,271	77.43%	4.02%	7.02%	0.96%	12.02%	87.09%
006	53436	-10.21%	39985	971	2.43%	29,687	74.25%	2.23%	10.92%	0.43%	14.07%	85.40%
007	59081	-0.72%	48771	302	0.62%	43,969	90.15%	0.68%	2.17%	0.41%	3.25%	95.14%
008	59872	0.61%	50372	481	0.95%	46,189	91.70%	1.34%	2.31%	0.49%	4.18%	94.94%
009	62470	4.97%	50156	824	1.64%	44,272	88.27%	1.88%	2.85%	0.57%	5.36%	93.79%
010	56520	-5.03%	44556	1936	4.35%	36,531	81.99%	3.89%	4.77%	1.50%	9.96%	88.85%
011	58393	-1.88%	45961	571	1.24%	40,709	88.57%	1.95%	3.50%	0.93%	5.86%	89.64%
012	53598	-9.94%	41802	4212	10.08%	33,542	80.24%	9.38%	2.73%	0.63%	12.96%	86.76%
013	55378	-6.94%	42286	8503	20.11%	27,061	64.00%	21.26%	5.57%	1.05%	27.87%	70.94%
014	55818	-6.21%	43085	3085	7.16%	35,799	83.09%	6.61%	3.24%	0.64%	10.52%	88.68%
015	59545	0.06%	45990	6521	14.18%	33,091	71.95%	14.44%	3.75%	0.85%	19.02%	80.20%
016	55811	-6.22%	42178	4400	10.43%	32,888	77.97%	11.66%	3.97%	0.54%	16.10%	83.34%
017	68483	15.08%	49430	9111	18.43%	35,630	72.08%	14.59%	4.52%	1.23%	20.40%	79.30%
018	57423	-3.51%	43653	6995	16.02%	32,035	73.39%	16.95%	3.60%	1.01%	21.16%	77.83%
019	63837	7.27%	47492	12031	25.33%	30,026	63.22%	19.64%	4.71%	0.77%	24.94%	73.49%
020	63416	6.56%	49305	4798	9.73%	36,595	74.22%	9.48%	5.52%	1.34%	16.83%	82.45%
021	68288	14.75%	50327	3263	6.48%	38,900	77.29%	6.39%	5.48%	0.90%	13.10%	86.25%
022	78338	31.64%	58059	3259	5.61%	43,312	74.60%	3.70%	4.10%	3.54%	11.66%	87.20%
023	68767	15.55%	52824	4410	8.35%	38,963	73.76%	7.83%	5.72%	1.57%	15.04%	84.01%
024	74474	25.14%	53973	2450	4.54%	39,740	73.63%	4.86%	5.79%	7.24%	14.91%	84.61%
025	78718	32.27%	54855	2710	4.94%	29,050	52.96%	5.15%	5.12%	16.23%	26.58%	72.19%
026	71029	19.35%	52950	2079	3.93%	41,876	79.99%	1.83%	4.72%	6.08%	8.81%	90.67%
027	56612	-4.87%	43719	1752	4.01%	33,552	76.74%	4.08%	9.00%	1.07%	14.43%	85.41%
028	54100	-9.09%	42143	2959	7.02%	35,517	84.28%	7.11%	2.49%	0.83%	10.56%	88.48%
029	59633	0.21%	44182	5445	12.32%	21,505	48.67%	16.78%	17.86%	2.39%	36.62%	61.56%
030	61636	3.57%	46977	3787	8.06%	29,053	61.85%	7.55%	12.91%	2.49%	22.61%	77.03%
031	68459	15.04%	50690	3741	7.38%	40,459	79.82%	7.79%	4.21%	2.25%	13.79%	85.43%
032	56167	-5.62%	44103	5090	11.54%	36,154	81.98%	12.82%	2.11%	1.00%	15.73%	83.50%
033	54336	-8.70%	42618	8432	19.79%	30,803	72.28%	22.24%	2.02%	0.79%	24.62%	74.78%
034	56693	-4.74%	45079	9604	21.30%	27,780	61.63%	20.64%	5.89%	5.32%	31.28%	67.73%
035	57886	-2.73%	44313	10692	24.13%	25,562	57.69%	24.85%	6.30%	3.58%	35.00%	64.17%
036	60211	1.18%	44780	7322	16.35%	32,151	71.80%	14.87%	4.37%	1.29%	21.98%	77.69%
037	59857	0.58%	46410	10955	23.60%	24,390	52.55%	24.83%	6.63%	3.16%	35.00%	63.58%
038	62943	5.77%	48261	24437	50.64%	15,431	31.97%	51.17%	6.91%	2.86%	60.72%	38.47%
039	60869	2.28%	44995	26682	59.30%	8,873	19.72%	61.90%	8.16%	1.79%	72.18%	27.74%
040	63857	7.30%	51468	13872	26.95%	28,906	56.16%	25.66%	4.81%	5.61%	35.46%	63.62%
041	57976	-2.58%	43268	16250	37.56%	11,898	27.50%	46.41%	16.05%	2.67%	65.54%	33.83%
042	60349	1.41%	48258	18527	38.39%	15,487	32.09%	44.83%	9.51%	4.95%	57.81%	41.67%
043	59696	0.31%	47598	7629	16.03%	28,469	59.81%	16.63%	5.61%	5.20%	29.40%	69.64%
044	62374	4.81%	49835	8737	17.53%	31,444	63.10%	15.57%	5.74%	4.84%	26.19%	72.46%
045	58143	-2.30%	43905	4408	10.04%	31,383	71.48%	7.50%	4.71%	7.54%	18.17%	81.18%
046	60949	2.42%	46079	4121	8.94%	34,095	73.99%	7.28%	6.59%	4.69%	17.69%	81.66%
047	64114	7.73%	47159	4582	9.72%	31,204	66.17%	11.87%	4.99%	6.02%	23.30%	75.80%
048	55778	-6.27%	43149	6163	14.28%	26,592	61.63%	17.18%	6.85%	9.73%	28.37%	70.87%
049	60907	2.35%	46620	5333	11.44%	28,116	60.31%	13.12%	5.87%	7.65%	30.77%	68.44%
050	58422	-1.83%	43398	5167	11.91%	19,646	45.27%	10.90%	4.75%	23.59%	38.83%	60.20%
051	56695	-4.73%	45521	10204	22.42%	26,116	57.37%	22.79%	5.14%	4.40%	33.60%	65.50%
052	61643	3.58%	48798	6895	14.13%	31,680	64.92%	12.78%	4.73%	7.50%	20.76%	78.79%
053	59222	-0.49%	45049	27565	61.19%	13,104	29.09%	63.29%	3.46%	2.92%	69.00%	30.57%
054	69697	17.12%	59879	10876	18.16%	39,159	65.40%	15.35%	3.47%	5.83%	24.97%	74.50%
055	61999	4.18%	51108	33101	64.77%	13,901	27.20%	67.98%	2.04%	1.97%	71.60%	27.49%
056	61095	2.66%	53924	25905	48.04%	19,464	36.10%	54.39%	4.34%	6.40%	65.69%	33.74%
057	66540	11.81%	57177	27200	47.57%	22,477	39.31%	52.31%	2.84%	5.35%	58.43%	40.53%
058	65527	10.11%	56677	28397	50.10%	21,935	38.70%	50.00%	4.01%	3.48%	56.90%	42.69%
059	58222	-2.17%	46003	21829	47.45%	17,665	38.40%	52.04%	4.28%	1.89%	58.03%	41.38%
060	58127	-2.33%	43553	33344	76.56%	4,240	9.74%	80.70%	3.85%	0.98%	86.24%	13.34%
061	59354	-0.26%	45331	34348	75.77%	6,959	15.35%	79.16%	3.92%	1.14%	84.40%	14.87%
062	65905	10.74%	50073	39451	78.79%	7,472	14.92%	75.78%	2.63%	1.08%	78.81%	20.38%
063	58808	-1.18%	45028	32109	71.31%	9,152	20.33%	68.95%	3.20%	0.89%	75.20%	24.64%
064	64501	8.39%	49557	33944	68.49%	11,697	23.60%	64.81%	3.12%	0.95%	69.87%	29.28%
065	67833	13.98%	50519	38799	76.80%	7,427	14.70%	76.32%	4.10%	0.44%	80.66%	19.33%

## Georgia State House --2015 Benchmark Plan

District	2020 Pop.	% 2020 Deviation	18+ Pop	18+ AP Black	% 18+ AP Black	18+ NH White	% 18+ NH White	2015-19 BCVAP*	2015-19 LCVAP*	2015-19 ACVAP*	2015-19 B+L+A CVAP*	2015-19 NH White CVAP*
066	61144	2.74%	45510	24223	53.23%	16,010	35.18%	48.54%	3.85%	1.54%	53.80%	44.85%
067	57771	-2.92%	43369	11856	27.34%	26,560	61.24%	25.88%	4.08%	0.55%	31.24%	67.84%
068	59772	0.44%	44770	8244	18.41%	32,321	72.19%	17.57%	2.95%	2.07%	21.43%	77.89%
069	55120	-7.38%	43010	7039	16.37%	33,026	76.79%	16.41%	1.70%	3.31%	19.31%	80.25%
070	63353	6.46%	48693	10566	21.70%	32,017	65.75%	21.43%	5.69%	1.51%	29.00%	69.51%
071	61940	4.08%	47170	5523	11.71%	35,361	74.97%	9.71%	4.19%	0.84%	15.58%	83.31%
072	62089	4.33%	46851	3889	8.30%	36,817	78.58%	7.46%	4.49%	1.12%	13.89%	84.90%
073	59650	0.23%	45300	15908	35.12%	25,132	55.48%	31.46%	3.35%	2.59%	36.67%	62.47%
074	59453	-0.10%	44149	30893	69.97%	3,797	8.60%	76.74%	5.66%	1.59%	88.63%	9.76%
075	59971	0.77%	44481	33035	74.27%	4,966	11.16%	74.70%	6.53%	2.86%	85.11%	13.70%
076	60289	1.31%	45682	31985	70.02%	6,829	14.95%	70.29%	5.18%	7.23%	79.46%	20.26%
077	59646	0.23%	43403	32125	74.02%	3,184	7.34%	79.70%	5.97%	3.46%	88.42%	10.27%
078	63912	7.40%	48066	32970	68.59%	8,046	16.74%	68.06%	5.65%	4.45%	78.23%	21.26%
079	60655	1.92%	46161	7197	15.59%	23,611	51.15%	16.11%	5.92%	4.17%	30.61%	68.71%
080	62454	4.95%	50528	7087	14.03%	29,628	58.64%	14.92%	6.19%	10.04%	27.89%	70.77%
081	57889	-2.73%	43778	5451	12.45%	17,266	39.44%	13.58%	11.23%	8.31%	36.97%	61.84%
082	60104	1.00%	49242	10673	21.67%	23,919	48.57%	22.83%	5.73%	8.59%	36.43%	63.10%
083	58151	-2.29%	45014	25705	57.10%	15,818	35.14%	60.69%	2.38%	6.17%	64.90%	34.40%
084	58926	-0.98%	46909	27376	58.36%	15,103	32.20%	62.85%	1.72%	0.99%	67.36%	31.91%
085	58672	-1.41%	45413	24313	53.54%	12,569	27.68%	64.23%	1.65%	3.65%	70.43%	28.19%
086	58735	-1.30%	44872	25358	56.51%	12,652	28.20%	60.60%	2.79%	3.23%	67.18%	32.05%
087	61907	4.03%	48197	32390	67.20%	8,759	18.17%	72.53%	2.47%	3.61%	79.15%	20.42%
088	58573	-1.58%	45361	29828	65.76%	8,532	18.81%	69.06%	3.30%	4.12%	74.75%	24.57%
089	59113	-0.67%	47470	25541	53.80%	18,116	38.16%	56.55%	2.38%	1.78%	60.88%	38.30%
090	56092	-5.75%	44252	32395	73.21%	9,099	20.56%	71.52%	2.33%	1.42%	75.30%	24.32%
091	63326	6.41%	48519	36427	75.08%	8,993	18.54%	70.53%	2.13%	1.27%	74.60%	24.35%
092	62076	4.31%	46059	34706	75.35%	6,632	14.40%	75.18%	5.34%	1.89%	81.11%	18.71%
093	63116	6.06%	46899	34029	72.56%	7,810	16.65%	73.44%	3.89%	1.57%	79.40%	20.69%
094	58956	-0.93%	44409	31259	70.39%	7,277	16.39%	72.01%	3.68%	2.83%	78.41%	20.66%
095	59626	0.19%	46343	11334	24.46%	22,015	47.50%	26.26%	7.89%	1.83%	43.19%	56.24%
096	63121	6.07%	47875	10796	22.55%	10,177	21.26%	28.82%	14.51%	18.81%	63.54%	35.85%
097	67840	14.00%	51200	7583	14.81%	23,307	45.52%	16.98%	6.83%	11.62%	42.56%	56.92%
098	69467	16.73%	50322	8337	16.57%	26,426	52.51%	15.84%	10.04%	16.87%	33.99%	65.03%
099	57117	-4.02%	40892	9457	23.13%	4,957	12.12%	35.04%	23.78%	21.18%	75.78%	22.95%
100	62039	4.25%	45865	14641	31.92%	6,532	14.24%	40.68%	19.03%	9.65%	74.57%	24.14%
101	61586	3.49%	47093	11829	25.12%	15,232	32.34%	26.17%	12.97%	11.44%	53.30%	45.98%
102	60423	1.53%	46498	11216	24.12%	19,265	41.43%	24.04%	9.64%	7.92%	46.80%	52.25%
103	68719	15.47%	51265	7163	13.97%	32,862	64.10%	13.27%	5.61%	10.33%	23.10%	75.70%
104	70403	18.30%	50358	15193	30.17%	23,455	46.58%	26.53%	9.78%	5.06%	41.63%	57.66%
105	68469	15.05%	49127	21189	43.13%	18,170	36.99%	38.44%	7.50%	8.06%	51.44%	47.50%
106	61283	2.98%	45578	16892	37.06%	18,068	39.64%	37.70%	6.86%	5.60%	50.27%	47.35%
107	61892	4.00%	45584	12050	26.43%	14,826	32.52%	29.27%	11.42%	15.26%	55.40%	44.07%
108	62204	4.53%	46265	9224	19.94%	17,694	38.24%	21.21%	8.84%	13.58%	44.43%	55.04%
109	61435	3.23%	45934	19376	42.18%	21,568	46.95%	38.09%	3.84%	14.28%	43.67%	55.08%
110	58585	-1.56%	43584	16776	38.49%	23,177	53.18%	34.93%	2.91%	5.09%	38.66%	60.61%
111	72223	21.36%	54047	27864	51.56%	19,761	36.56%	42.45%	5.68%	2.32%	52.85%	45.25%
112	59024	-0.82%	45783	11169	24.40%	31,615	69.05%	22.49%	1.75%	0.90%	24.73%	74.65%
113	62616	5.22%	46409	30886	66.55%	11,619	25.04%	64.54%	3.97%	1.08%	69.66%	29.15%
114	68346	14.85%	50084	12564	25.09%	30,857	61.61%	18.55%	4.34%	0.39%	25.31%	73.74%
115	61063	2.61%	46292	8840	19.10%	34,066	73.59%	20.62%	2.10%	2.17%	23.59%	76.31%
116	62437	4.92%	47116	5664	12.02%	33,456	71.01%	11.39%	6.82%	6.15%	21.53%	77.75%
117	62578	5.15%	49974	8298	16.60%	34,611	69.26%	17.59%	4.32%	0.69%	25.31%	73.97%
118	57487	-3.40%	45997	13870	30.15%	23,982	52.14%	34.66%	5.12%	0.31%	42.57%	56.66%
119	64173	7.83%	51562	5503	10.67%	38,810	75.27%	13.70%	2.94%	2.74%	19.48%	79.77%
120	56747	-4.64%	45663	12156	26.62%	29,844	65.36%	30.26%	2.35%	2.56%	33.08%	66.47%
121	71942	20.89%	52482	14912	28.41%	31,422	59.87%	27.04%	5.01%	2.58%	33.28%	64.87%
122	68296	14.76%	50164	7657	15.26%	35,121	70.01%	13.29%	4.98%	3.54%	23.36%	75.85%
123	54117	-9.06%	42777	8589	20.08%	29,048	67.91%	18.44%	3.25%	0.34%	25.11%	73.99%
124	52995	-10.95%	42284	23711	56.08%	14,900	35.24%	57.00%	2.89%	1.07%	61.90%	37.71%
125	55228	-7.20%	40997	23381	57.03%	14,975	36.53%	55.51%	2.89%	1.81%	58.94%	40.05%
126	55534	-6.68%	42284	25298	59.83%	14,554	34.42%	61.84%	3.65%	1.54%	66.86%	32.14%
127	57799	-2.88%	45604	24005	52.64%	16,115	35.34%	56.03%	4.98%	4.19%	62.66%	36.75%
128	49614	-16.63%	39878	21782	54.62%	17,078	42.83%	56.08%	1.44%	0.32%	57.75%	42.39%
129	55994	-5.91%	43520	11410	26.22%	29,833	68.55%	29.73%	2.01%	1.69%	32.03%	67.80%
130	59507	-0.01%	45465	16504	36.30%	25,679	56.48%	36.56%	2.56%	0.53%	40.05%	60.17%
131	55357	-6.98%	43059	10230	23.76%	30,896	71.75%	23.61%	0.92%	4.69%	25.08%	73.75%
132	56169	-5.62%	42091	17773	42.23%	20,537	48.79%	42.50%	2.67%	1.66%	45.92%	53.48%



## Georgia State House --2015 Benchmark Plan

District	2020 Pop.	% 2020 Deviation	18+ Pop	18+ AP Black	% 18+ AP Black	18+ NH White	% 18+ NH White	2015-19 BCVAP*	2015-19 LCVAP*	2015-19 ACVAP*	2015-19 B+L+A CVAP*	2015-19 NH White CVAP*
133	57022	-4.18%	44303	8622	19.46%	32,074	72.40%	20.71%	3.17%	1.08%	26.07%	73.03%
134	59978	0.78%	46587	10038	21.55%	30,152	64.72%	20.92%	5.78%	0.98%	29.76%	69.43%
135	52783	-11.31%	39634	21339	53.84%	13,841	34.92%	56.11%	5.62%	0.53%	63.30%	35.45%
136	59740	0.38%	44709	27994	62.61%	12,137	27.15%	59.03%	6.60%	0.56%	67.20%	31.72%
137	55297	-7.08%	42627	21950	51.49%	17,923	42.05%	53.91%	2.62%	1.04%	57.47%	41.24%
138	48015	-19.32%	36764	14129	38.43%	18,674	50.79%	40.07%	5.77%	2.17%	47.22%	51.87%
139	44994	-24.39%	36147	20024	55.40%	13,444	37.19%	56.50%	3.27%	2.78%	60.16%	39.71%
140	55262	-7.14%	43076	14961	34.73%	24,694	57.33%	34.60%	2.02%	1.42%	37.32%	62.05%
141	59933	0.71%	46674	13592	29.12%	29,189	62.54%	28.06%	2.18%	1.90%	32.86%	66.46%
142	51695	-13.13%	38610	25624	66.37%	10,837	28.07%	68.25%	1.70%	1.38%	70.61%	28.67%
143	52996	-10.95%	41264	25237	61.16%	13,321	32.28%	60.27%	1.68%	1.04%	63.29%	36.18%
144	53320	-10.40%	41105	11199	27.24%	27,494	66.89%	27.39%	1.66%	2.01%	29.73%	69.68%
145	51468	-13.52%	41854	16298	38.94%	23,385	55.87%	38.98%	1.53%	0.98%	41.67%	57.87%
146	66372	11.53%	49300	13867	28.13%	29,797	60.44%	25.94%	4.00%	2.70%	34.01%	65.50%
147	56551	-4.97%	42863	14884	34.72%	22,131	51.63%	34.71%	4.98%	3.25%	41.19%	56.93%
148	52451	-11.86%	40777	14232	34.90%	24,239	59.44%	37.45%	1.68%	0.24%	39.35%	60.01%
149	47480	-20.22%	37873	12515	33.04%	22,424	59.21%	35.08%	1.83%	0.33%	37.09%	62.26%
150	54598	-8.26%	41582	14653	35.24%	25,014	60.16%	33.61%	2.15%	0.52%	36.44%	63.21%
151	49836	-16.26%	39653	21196	53.45%	15,978	40.29%	55.96%	1.17%	1.10%	57.45%	41.81%
152	57158	-3.95%	43773	10579	24.17%	30,604	69.92%	24.76%	1.73%	1.55%	28.12%	70.80%
153	48115	-19.15%	37100	24171	65.15%	11,102	29.92%	65.74%	1.38%	0.97%	68.04%	31.69%
154	50644	-14.90%	39577	23977	60.58%	14,269	36.05%	60.40%	1.32%	0.26%	62.23%	36.98%
155	54133	-9.04%	41793	11659	27.90%	26,456	63.30%	28.16%	2.64%	0.73%	31.68%	68.27%
156	52848	-11.20%	40027	9148	22.85%	26,790	66.93%	23.45%	4.56%	0.43%	28.45%	71.00%
157	51799	-12.96%	39552	10509	26.57%	25,420	64.27%	28.94%	5.23%	0.39%	34.68%	65.17%
158	56451	-5.14%	43664	14533	33.28%	26,211	60.03%	34.89%	1.59%	0.28%	37.02%	62.33%
159	57616	-3.18%	43244	11207	25.92%	29,598	68.44%	26.97%	2.38%	0.57%	29.87%	69.50%
160	62546	5.10%	50033	11358	22.70%	34,261	65.48%	23.29%	2.14%	0.91%	26.30%	72.94%
161	78104	31.24%	58514	14735	25.18%	35,969	61.47%	21.83%	3.65%	1.73%	27.25%	71.69%
162	56476	-5.10%	43083	22039	51.15%	14,320	33.24%	55.77%	6.12%	3.03%	63.56%	35.76%
163	54068	-9.15%	44616	18595	41.68%	20,690	46.37%	48.36%	3.69%	1.32%	53.37%	45.51%
164	70818	19.00%	53011	15197	28.67%	28,909	54.53%	27.74%	8.14%	2.70%	39.12%	59.61%
165	55158	-7.31%	44116	20459	46.38%	18,915	42.88%	56.50%	2.91%	0.78%	60.87%	38.13%
166	60603	1.83%	48269	3497	7.24%	40,305	83.50%	7.29%	2.83%	2.50%	12.59%	86.68%
167	54642	-8.18%	41781	8597	20.58%	28,625	68.51%	24.31%	3.69%	0.87%	28.80%	70.14%
168	55803	-6.23%	41255	19734	47.83%	15,862	38.45%	46.51%	9.62%	2.01%	58.05%	40.24%
169	54859	-7.82%	41038	10044	24.47%	25,774	62.81%	25.87%	5.55%	0.67%	31.96%	67.61%
170	53411	-10.25%	40005	9291	23.22%	26,669	66.66%	22.51%	3.96%	0.92%	27.35%	72.24%
171	53948	-9.35%	41293	15944	38.61%	22,289	53.98%	39.17%	2.15%	0.64%	42.09%	57.29%
172	53474	-10.14%	39924	11055	27.69%	22,351	55.98%	32.33%	6.36%	0.57%	39.28%	59.70%
173	55516	-6.71%	42468	15024	35.38%	23,656	55.70%	37.34%	2.34%	0.42%	40.16%	59.01%
174	54884	-7.78%	41660	9155	21.98%	27,292	65.51%	22.36%	5.31%	0.74%	28.61%	70.20%
175	59314	-0.33%	45493	12042	26.47%	29,973	65.88%	25.58%	3.49%	2.38%	30.61%	68.92%
176	57394	-3.56%	43069	10557	24.51%	27,795	64.54%	26.05%	4.64%	0.40%	31.36%	66.97%
177	54089	-9.11%	41311	23618	57.17%	14,014	33.92%	55.70%	2.91%	0.84%	59.44%	39.88%
178	53932	-9.37%	41153	3490	8.48%	34,940	84.90%	9.27%	1.79%	0.47%	11.71%	87.31%
179	57000	-4.22%	44961	12771	28.40%	28,097	62.49%	29.49%	3.02%	1.61%	34.26%	65.03%
180	57629	-3.16%	43969	8304	18.89%	31,150	70.85%	19.04%	4.40%	1.62%	24.93%	74.21%

Total  
2020

Pop. 10,711,908

Majority Districts

56.66%

8,220,274

2,607,986

31.73%

4,342,333

52.82%

47

48

62

118

# EXHIBIT W-2

RETRIEVED FROM DEMOCRACYDOCKET.COM

## Population Summary Report -- 2010 Census

## Georgia State House -2011 Plan

District	2010 Pop.	% 2010		18+ AP	% 18+ AP	18+ NH	% 18+ NH	2006-2010		2006-2010		2006-2010	B+L+A
		Deviation	18+ Pop					BCVAP*	LCVAP*	ACVAP*	CVAP*		
001	53612	-0.39%	41298	1166	2.82%	38907	94.21%	2.36%	0.80%	0.42%	3.58%		
002	53910	0.17%	40653	1583	3.89%	37529	92.32%	3.88%	2.22%	0.35%	6.45%		
003	53366	-0.84%	40240	915	2.27%	37632	93.52%	1.94%	1.48%	0.64%	4.06%		
004	54120	0.56%	38389	2067	5.38%	22677	59.07%	6.24%	12.14%	1.22%	19.60%		
005	53589	-0.43%	38998	1553	3.98%	32076	82.25%	4.03%	4.24%	0.57%	8.84%		
006	53968	0.27%	38578	812	2.10%	30623	79.38%	2.47%	6.11%	0.18%	8.76%		
007	54058	0.44%	43050	180	0.42%	40398	93.84%	0.07%	1.07%	0.05%	1.19%		
008	53905	0.16%	43921	263	0.60%	41656	94.84%	0.59%	0.99%	0.25%	1.83%		
009	54287	0.87%	42203	469	1.11%	39250	93.00%	0.80%	1.48%	0.52%	2.80%		
010	54204	0.71%	41461	1564	3.77%	35595	85.85%	4.05%	3.03%	0.96%	8.04%		
011	53610	-0.39%	40794	434	1.06%	37906	92.92%	1.21%	2.04%	0.24%	3.49%		
012	54317	0.92%	41793	3893	9.31%	35349	84.58%	9.09%	1.12%	0.53%	10.74%		
013	53445	-0.70%	40153	7975	19.86%	27406	68.25%	21.19%	2.71%	1.06%	24.96%		
014	53527	-0.54%	39442	2556	6.48%	34794	88.22%	7.33%	1.84%	0.66%	9.83%		
015	53473	-0.64%	39649	4989	12.58%	30998	78.18%	11.20%	2.09%	0.52%	13.81%		
016	53926	0.20%	39416	4098	10.40%	31812	80.71%	10.53%	2.58%	0.55%	13.66%		
017	54036	0.40%	37564	4941	13.15%	30620	81.51%	12.11%	3.06%	1.01%	16.18%		
018	54209	0.72%	40590	6387	15.74%	31523	77.66%	15.71%	2.46%	0.42%	18.59%		
019	54164	0.64%	38287	6733	17.59%	28968	75.66%	14.16%	2.61%	0.43%	17.20%		
020	53679	-0.26%	38519	2832	7.35%	31648	82.16%	6.04%	3.22%	1.14%	10.40%		
021	54040	0.41%	38275	1969	5.14%	32310	84.42%	4.13%	4.02%	1.16%	9.31%		
022	54090	0.50%	38675	1434	3.71%	33227	85.91%	3.07%	3.13%	1.27%	7.47%		
023	53852	0.06%	39892	2345	5.88%	32041	80.32%	4.72%	4.62%	0.68%	10.02%		
024	53544	-0.51%	37966	1072	2.82%	31093	81.90%	2.20%	3.58%	2.05%	7.83%		
025	54157	0.63%	35375	1339	3.79%	26584	75.15%	3.16%	3.58%	7.18%	13.92%		
026	53850	0.06%	38105	564	1.48%	34061	89.39%	1.05%	2.62%	0.89%	4.56%		
027	53475	-0.64%	39856	599	1.50%	36466	91.49%	1.49%	2.78%	0.45%	4.72%		
028	53526	-0.55%	40206	2868	7.13%	34100	84.81%	7.17%	2.09%	0.69%	9.95%		
029	53712	-0.20%	38911	3207	8.24%	23834	61.25%	9.29%	7.13%	1.72%	18.14%		
030	53926	0.20%	37499	5073	13.53%	19883	53.02%	17.33%	10.24%	1.06%	28.63%		
031	53585	-0.44%	39241	2596	6.62%	33797	86.13%	6.48%	2.59%	1.03%	10.10%		
032	54017	0.37%	41866	5031	12.02%	35217	84.12%	12.22%	0.72%	0.41%	13.35%		
033	53537	-0.53%	41192	8619	20.92%	30883	74.97%	20.63%	1.37%	0.11%	22.11%		
034	54162	0.64%	41682	7266	17.43%	28879	69.28%	13.93%	4.12%	3.85%	21.90%		
035	53394	-0.79%	37954	7917	20.86%	24818	65.39%	17.02%	4.17%	3.78%	24.97%		
036	54192	0.69%	37923	4540	11.97%	30901	81.48%	13.08%	3.24%	2.11%	18.43%		
037	54233	0.77%	40849	8813	21.57%	24313	59.52%	22.30%	4.08%	2.06%	28.44%		
038	53921	0.19%	39397	16677	42.33%	18189	46.17%	40.73%	5.07%	1.07%	46.87%		
039	54192	0.69%	38182	20007	52.40%	11379	29.80%	58.30%	4.04%	1.11%	63.45%		
040	53978	0.29%	43428	9296	21.41%	29261	67.38%	19.31%	2.89%	2.84%	25.04%		
041	54148	0.61%	38676	14288	36.94%	13396	34.64%	42.49%	6.90%	3.10%	52.49%		
042	53894	0.14%	40861	16393	40.12%	13093	32.04%	45.23%	6.27%	2.64%	54.14%		
043	53969	0.28%	42593	6508	15.28%	29183	68.52%	13.70%	2.84%	3.55%	20.09%		
044	53480	-0.63%	40695	4852	11.92%	30205	74.22%	12.19%	4.12%	4.01%	20.32%		
045	53969	0.28%	40117	3717	9.27%	31732	79.10%	5.53%	2.34%	4.15%	12.02%		
046	53712	-0.20%	39868	2803	7.03%	32356	81.16%	8.32%	3.21%	3.18%	14.71%		
047	54102	0.52%	38241	3166	8.28%	29012	75.87%	7.30%	3.30%	4.27%	14.87%		
048	53832	0.02%	40207	5159	12.83%	24867	61.85%	12.55%	4.13%	2.34%	19.02%		
049	53609	-0.39%	38077	3978	10.45%	26375	69.27%	10.39%	4.01%	5.02%	19.42%		
050	53486	-0.62%	36917	3577	9.69%	21065	57.06%	12.51%	3.42%	13.98%	29.91%		
051	53630	-0.35%	41035	8890	21.66%	26239	63.94%	19.78%	3.28%	4.35%	27.41%		
052	53458	-0.67%	41106	5541	13.48%	28739	69.91%	12.68%	1.69%	1.66%	16.03%		
053	53464	-0.66%	39598	23783	60.06%	11896	30.04%	64.43%	2.61%	1.03%	68.07%		
054	53576	-0.45%	44566	5754	12.91%	32767	73.52%	12.29%	2.60%	2.95%	17.84%		
055	53875	0.10%	43575	30335	69.62%	11097	25.47%	69.9%	1.28%	1.19%	72.35%		
056	53,564	-0.48%	46,750	25886	55.37%	14,630	31.29%	55.30%	2.90%	3.57%	61.77%		
057	54,205	0.72%	45,178	25177	55.73%	16,387	36.27%	54.54%	2.18%	2.29%	59.01%		
058	53,635	-0.34%	44,854	25774	57.46%	16,124	35.95%	55.98%	1.58%	2.56%	60.12%		
059	53,359	-0.86%	41,605	23736	57.05%	14,315	34.41%	59.41%	3.48%	1.43%	64.32%		
060	53,690	-0.24%	38,177	25398	66.53%	5,908	15.48%	73.20%	6.25%	3.74%	83.19%		
061	54,224	0.75%	39,023	27420	70.27%	8,628	22.11%	68.71%	2.22%	0.72%	71.65%		
062	53,740	-0.15%	38,345	26850	70.02%	9,599	25.03%	67.96%	2.57%	1.05%	71.58%		
063	53,547	-0.51%	39,038	25202	64.56%	11,331	29.03%	62.59%	2.56%	1.16%	66.31%		
064	53,952	0.25%	39,190	24004	61.25%	12,529	31.97%	59.04%	2.61%	1.51%	63.16%		
065	54,298	0.89%	37,616	26009	69.14%	8,618	22.91%	70.28%	2.81%	0.49%	73.58%		
066	54,130	0.58%	38,363	15500	40.40%	19,904	51.88%	35.92%	3.38%	1.24%	40.54%		
067	54,230	0.76%	38,436	7530	19.59%	28,486	74.11%	18.82%	2.66%	0.64%	22.12%		
068	53,699	-0.22%	38,489	6315	16.41%	30,014	77.98%	15.67%	1.45%	0.56%	17.68%		

## Population Summary Report -- 2010 Census

## Georgia State House -2011 Plan

District	2010 Pop.	% 2010		18+ AP	% 18+ AP	18+ NH	% 18+ NH	2006-2010		2006-2010		2006-2010	B+L+A
		Deviation	18+ Pop					BCVAP*	LCVAP*	ACVAP*	CVAP*		
069	54,158	0.63%	41,364	5771	13.95%	33,786	81.68%	13.36%	0.64%	0.33%	14.33%		
070	54,341	0.97%	40,088	7771	19.38%	28,831	71.92%	18.05%	2.53%	1.09%	21.67%		
071	54,165	0.64%	38,886	4079	10.49%	31,429	80.82%	11.48%	3.43%	1.36%	16.27%		
072	53,807	-0.02%	38,955	2574	6.61%	33,034	84.80%	6.61%	2.96%	1.44%	11.01%		
073	54,027	0.38%	39,600	10377	26.20%	26,797	67.67%	23.99%	1.85%	0.97%	26.81%		
074	53,401	-0.78%	38,810	25271	65.11%	5,444	14.03%	69.33%	3.89%	5.86%	79.08%		
075	53,930	0.20%	38,464	26094	67.84%	7,354	19.12%	69.54%	3.10%	2.31%	74.95%		
076	53,288	-0.99%	38,157	24251	63.56%	9,179	24.06%	63.12%	3.42%	3.27%	69.81%		
077	53,704	-0.22%	37,349	26045	69.73%	4,674	12.51%	76.92%	4.09%	2.74%	83.75%		
078	53,616	-0.38%	38,129	22091	57.94%	10,582	27.75%	55.93%	4.47%	3.83%	64.23%		
079	53,714	-0.20%	41,179	6609	16.05%	24,635	59.82%	13.01%	2.90%	5.85%	21.76%		
080	53,535	-0.53%	43,496	5384	12.38%	26,919	61.89%	11.25%	3.93%	4.40%	19.58%		
081	53,590	-0.43%	41,186	4518	10.97%	16,960	41.18%	14.85%	7.92%	9.13%	31.90%		
082	53,564	-0.48%	43,727	7170	16.40%	23,793	54.41%	12.93%	5.64%	6.19%	24.76%		
083	53,652	-0.31%	41,089	25326	61.64%	13,935	33.91%	64.10%	1.40%	0.99%	66.49%		
084	53,650	-0.32%	41,782	24887	59.56%	14,386	34.43%	60.67%	1.84%	1.38%	63.89%		
085	54,195	0.70%	41,110	24001	58.38%	10,635	25.87%	63.79%	2.25%	3.13%	69.17%		
086	53,878	0.11%	40,880	25225	61.70%	12,199	29.84%	61.91%	1.22%	3.08%	66.21%		
087	54,104	0.53%	40,610	27034	66.57%	9,417	23.19%	66.69%	2.87%	2.89%	72.45%		
088	54,194	0.69%	40,173	25255	62.87%	9,503	23.66%	67.18%	3.37%	2.01%	72.56%		
089	53,838	0.03%	42,011	26500	63.08%	13,823	32.90%	63.49%	2.27%	1.08%	66.84%		
090	53,620	-0.37%	39,580	26842	67.82%	11,351	28.68%	65.81%	1.79%	1.09%	68.69%		
091	54,022	0.38%	39,377	24927	63.30%	12,540	31.85%	59.19%	1.48%	1.39%	62.06%		
092	54,205	0.72%	38,475	25812	67.09%	8,390	21.81%	67.92%	2.10%	0.38%	70.40%		
093	54,333	0.95%	37,658	24507	65.08%	10,340	27.46%	63.10%	1.80%	2.31%	67.21%		
094	53,570	-0.46%	38,031	25154	66.14%	9,399	24.71%	65.76%	3.05%	1.70%	70.51%		
095	54,289	0.87%	39,953	8348	20.89%	21,216	53.10%	21.81%	4.02%	8.63%	34.46%		
096	53,962	0.26%	39,523	7522	19.03%	11,306	26.61%	25.59%	9.10%	17.08%	51.77%		
097	53,821	0.00%	38,410	4067	10.59%	23,328	50.73%	11.86%	5.04%	10.59%	27.49%		
098	53,755	-0.12%	37,662	3719	9.87%	26,455	70.24%	8.16%	5.05%	3.93%	17.14%		
099	53,673	-0.27%	37,254	8380	22.49%	5,663	15.74%	36.91%	15.99%	12.33%	65.23%		
100	53,679	-0.26%	37,465	12362	33.00%	7,499	20.02%	40.67%	12.14%	11.25%	64.06%		
101	53,747	-0.14%	38,785	7813	20.14%	18,417	47.48%	18.95%	6.76%	10.33%	36.04%		
102	53,770	-0.09%	39,110	7436	19.01%	21,477	54.91%	17.69%	6.72%	9.85%	34.26%		
103	53,539	-0.52%	37,730	5689	15.08%	25,829	68.46%	13.92%	4.98%	2.78%	21.68%		
104	53,374	-0.83%	35,769	6180	17.28%	24,675	68.98%	15.81%	4.57%	3.10%	23.48%		
105	53,718	-0.19%	36,580	12384	33.85%	17,712	48.42%	31.27%	6.87%	3.29%	41.43%		
106	53,473	-0.64%	38,585	10093	26.16%	22,889	59.32%	23.57%	3.34%	4.67%	31.58%		
107	53,368	-0.84%	37,377	8121	21.73%	17,931	47.97%	20.19%	6.57%	11.07%	37.83%		
108	53,549	-0.50%	39,456	6235	15.80%	21,021	53.28%	15.22%	5.82%	10.54%	31.58%		
109	54,292	0.88%	38,161	10584	27.74%	24,923	65.31%	24.16%	2.94%	1.83%	28.93%		
110	54,076	0.48%	38,376	11665	30.40%	24,658	64.25%	29.78%	3.00%	0.43%	33.21%		
111	54,197	0.70%	38,545	13317	34.55%	21,638	56.14%	30.80%	3.87%	2.98%	37.65%		
112	53,657	-0.30%	40,120	8552	21.32%	29,845	74.39%	19.58%	1.36%	1.15%	22.09%		
113	53,670	-0.28%	37,191	21214	57.04%	13,813	37.14%	53.39%	2.93%	0.66%	56.98%		
114	53,571	-0.46%	38,119	5566	14.60%	29,693	77.90%	11.43%	2.10%	1.78%	15.31%		
115	53,559	-0.48%	39,330	7386	18.78%	30,398	77.29%	19.55%	1.09%	0.29%	20.93%		
116	53,885	0.12%	38,935	4019	10.32%	30,680	78.80%	9.30%	3.34%	2.49%	15.13%		
117	54,352	0.99%	43,102	7399	17.17%	31,068	72.08%	18.90%	2.52%	2.67%	24.09%		
118	53,858	0.07%	42,287	12998	30.74%	22,996	54.38%	32.01%	3.51%	1.60%	37.12%		
119	53,330	-0.91%	43,291	5052	11.67%	33,767	78.00%	10.57%	2.09%	2.64%	15.30%		
120	53,857	0.07%	42,036	12394	29.48%	27,514	65.45%	30.68%	1.44%	0.23%	32.35%		
121	54,069	0.46%	39,434	9357	23.73%	27,460	69.64%	25.00%	2.46%	0.80%	28.26%		
122	53,789	-0.06%	38,559	4545	11.79%	30,060	77.96%	9.95%	2.97%	4.33%	17.25%		
123	54,305	0.90%	41,748	7302	17.49%	30,989	74.23%	16.25%	2.00%	2.45%	20.70%		
124	53,886	0.12%	42,242	23177	54.87%	16,470	38.99%	54.70%	2.30%	0.95%	57.95%		
125	54,151	0.62%	39,400	20239	51.37%	17,430	44.24%	50.02%	2.26%	0.98%	53.26%		
126	53,613	-0.38%	38,267	22711	59.35%	13,760	35.96%	58.42%	2.86%	1.00%	62.28%		
127	53,672	-0.27%	40,411	21166	52.38%	16,197	40.08%	53.07%	3.27%	1.28%	57.62%		
128	53,559	-0.48%	41,388	22681	54.80%	17,800	43.01%	57.56%	0.55%	0.13%	58.24%		
129	53,337	-0.90%	40,449	11064	27.35%	28,085	69.43%	27.36%	0.50%	0.33%	28.19%		
130	53,800	-0.04%	39,700	12673	31.92%	25,376	63.92%	31.10%	1.60%	0.30%	33.00%		
131	54,163	0.64%	41,142	10296	25.03%	29,784	72.39%	24.94%	0.64%	0.26%	25.84%		
132	53,756	-0.12%	38,796	15878	40.93%	20,253	52.20%	42.81%	1.71%	0.10%	44.62%		
133	53,564	-0.48%	40,825	7557	18.51%	31,346	76.78%	18.65%	1.43%	1.20%	21.28%		
134	53,328	-0.91%	40,802	6684	16.38%	30,463	74.66%	15.94%	4.42%	2.45%	22.81%		
135	53,588	-0.43%	39,104	21613	55.27%	14,206	36.33%	51.41%	3.26%	0.92%	55.59%		
136	53,614	-0.38%	39,806	22062	55.42%	14,317	35.97%	54.10%	4.73%	1.06%	59.89%		

## Population Summary Report -- 2010 Census

## Georgia State House -2011 Plan

District	2010 Pop.	% 2010		18+ AP	% 18+ AP	18+ NH	% 18+ NH	2006-2010	2006-2010	2006-2010	2006-2010
		Deviation	18+ Pop								B+L+A
				Black	Black	White	White	BCVAP*	LCVAP*	ACVAP*	CVAP*
137	53,431	-0.72%	39,957	20929	52.38%	17,430	43.62%	52.20%	2.20%	0.75%	55.15%
138	53,825	0.01%	39,760	15183	38.19%	21,346	53.69%	39.15%	3.88%	0.89%	43.92%
139	53,594	-0.42%	41,652	23534	56.50%	15,910	38.20%	58.13%	1.79%	0.11%	60.03%
140	54,060	0.45%	41,014	13018	31.74%	25,617	62.46%	31.79%	1.92%	0.66%	34.37%
141	54,344	0.97%	41,154	9238	22.45%	29,476	71.62%	21.24%	1.85%	1.92%	25.01%
142	53,493	-0.61%	38,488	24286	63.10%	12,859	33.41%	61.59%	0.87%	0.88%	63.34%
143	53,945	0.23%	40,592	23591	58.12%	15,503	38.19%	57.07%	1.56%	0.51%	59.14%
144	53,343	-0.89%	40,553	11199	27.62%	27,961	68.95%	28.31%	0.47%	0.63%	29.41%
145	53,485	-0.62%	42,344	15738	37.17%	25,035	59.12%	38.37%	1.44%	0.79%	40.60%
146	53,671	-0.28%	38,823	9475	24.41%	26,352	67.88%	23.43%	2.75%	1.75%	27.93%
147	53,333	-0.90%	39,589	10731	27.11%	24,720	62.44%	25.27%	4.00%	1.77%	31.04%
148	53,393	-0.79%	40,651	13869	34.12%	25,181	61.94%	35.21%	1.19%	0.43%	36.83%
149	53,612	-0.39%	41,813	13302	31.81%	25,532	61.06%	33.80%	2.50%	0.16%	36.46%
150	54,142	0.60%	40,188	13104	32.61%	25,778	64.14%	32.60%	0.77%	0.74%	34.11%
151	54,071	0.47%	41,637	21588	51.85%	17,760	42.65%	54.28%	0.56%	0.14%	54.98%
152	53,990	0.32%	39,824	9204	23.11%	29,143	73.18%	23.15%	1.18%	0.29%	24.62%
153	54,116	0.55%	40,411	24053	59.52%	14,776	36.56%	58.29%	1.53%	0.38%	60.20%
154	53,972	0.28%	40,393	23850	59.04%	15,734	38.95%	58.96%	0.58%	0.26%	59.80%
155	54,020	0.37%	40,658	10979	27.00%	27,516	67.68%	26.68%	1.28%	0.46%	28.42%
156	53,637	-0.34%	39,399	8571	21.75%	27,559	69.95%	22.51%	3.22%	0.34%	26.07%
157	54,334	0.96%	41,282	11367	27.54%	26,508	64.21%	28.32%	1.69%	0.20%	30.21%
158	53,861	0.08%	40,158	13040	32.47%	24,812	61.79%	34.35%	1.21%	0.17%	35.73%
159	53,363	-0.85%	39,250	10906	27.79%	27,220	69.35%	27.22%	0.85%	0.35%	28.42%
160	53,304	-0.96%	43,070	8969	20.82%	31,753	73.72%	19.16%	1.95%	0.83%	21.94%
161	53,931	0.21%	39,726	7185	18.09%	29,619	74.56%	16.60%	2.44%	1.66%	20.70%
162	53,981	0.30%	39,859	19719	49.47%	15,220	38.18%	54.96%	3.27%	1.42%	59.65%
163	53,520	-0.56%	42,793	20549	48.02%	19,655	45.93%	50.89%	2.15%	0.64%	53.68%
164	53,429	-0.73%	37,716	9242	24.50%	24,373	64.62%	22.65%	5.51%	2.06%	30.22%
165	54,179	0.67%	41,654	21735	52.18%	17,665	42.41%	51.51%	1.64%	1.87%	55.02%
166	54,210	0.72%	43,386	4464	10.29%	36,437	83.98%	8.71%	2.20%	1.83%	12.74%
167	54,342	0.97%	40,594	8882	21.88%	28,983	71.40%	21.36%	3.07%	0.41%	24.84%
168	54,032	0.39%	38,351	17364	45.28%	16,842	43.92%	44.81%	6.81%	1.69%	53.31%
169	53,975	0.29%	39,756	8916	22.43%	27,060	68.07%	23.71%	4.21%	0.00%	27.92%
170	53,301	-0.96%	39,206	8261	21.07%	28,260	72.08%	22.99%	1.68%	0.27%	24.94%
171	54,189	0.69%	40,274	14972	37.18%	22,767	56.53%	38.06%	2.13%	0.23%	40.42%
172	53,287	-0.99%	38,475	10746	27.93%	22,620	58.79%	30.48%	3.89%	0.38%	34.75%
173	54,287	0.87%	40,561	14271	35.18%	23,472	57.87%	37.50%	1.30%	0.38%	39.18%
174	54,123	0.56%	39,946	9117	22.82%	27,945	69.96%	23.95%	1.60%	0.32%	25.87%
175	53,794	-0.05%	41,150	10559	25.66%	28,506	69.27%	24.55%	1.74%	0.66%	26.95%
176	54,258	0.81%	40,023	9625	24.05%	27,233	68.04%	23.95%	2.10%	0.58%	26.63%
177	54,030	0.39%	41,506	21161	50.98%	17,893	43.11%	52.18%	1.99%	0.86%	55.03%
178	53,463	-0.66%	40,080	3608	9.00%	34,355	85.72%	9.50%	1.49%	0.38%	11.37%
179	54,081	0.48%	41,101	12187	29.65%	25,856	62.91%	30.78%	2.02%	0.48%	33.28%
180	53,321	-0.93%	39,225	7340	18.71%	29,232	74.52%	18.96%	3.46%	1.17%	23.59%

Total  
2010

Pop.	9,687,653	1.98%	7,196,101	2,140,789	29.75%	4,242,514	58.96%
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## CVAP Source:

\* 2006-110 ACS Special Tabulation

Note: Citizen Voting Age Population (CVAP) percentages are disaggregated from block-group level ACS estimates (with a survey midpoint of July 2017)



# EXHIBIT W-3

RETRIEVED FROM DEMOCRACYDOCKET.COM

## Population Summary Report -- 2010 Census

## Georgia State House -2006 Benchmark Plan

District	2010 Pop.	% 2010		18+ AP	% 18+ AP	18+ NH	% 18+ NH	2006-2010	2006-2010	2006-2010	2006-2010
		Deviation	18+ Pop								B+L+A
				Black	Black	White	White	BCVAP*	LCVAP*	ACVAP*	CVAP*
001	53454	-0.68%	41046	1819	4.43%	37825	92.15%	4.19%	1.44%	0.40%	6.03%
002	49475	-8.07%	38103	948	2.49%	36046	94.60%	2.38%	0.79%	0.45%	3.62%
003	55830	3.73%	41339	789	1.91%	38447	93.00%	1.45%	2.52%	0.35%	4.32%
004	56709	5.37%	39715	2131	5.37%	22090	55.62%	6.62%	13.34%	1.23%	21.19%
005	53590	-0.43%	39255	1347	3.43%	31958	81.41%	3.22%	4.91%	0.56%	8.69%
006	53746	-0.14%	39195	857	2.19%	33244	84.82%	2.21%	4.07%	0.39%	6.67%
007	55327	2.80%	44022	180	0.41%	41327	93.88%	0.07%	1.08%	0.05%	1.20%
008	53313	-0.94%	43555	296	0.68%	41278	94.77%	0.73%	0.93%	0.25%	1.91%
009	70203	30.44%	53356	618	1.16%	49262	92.33%	0.58%	1.71%	0.44%	2.73%
010	56695	5.34%	43060	1531	3.56%	37160	86.30%	3.74%	2.97%	0.92%	7.63%
011	47447	-11.84%	36842	3376	9.16%	31666	85.95%	8.51%	0.72%	0.33%	9.56%
012	56194	4.41%	42381	667	1.57%	39732	93.75%	1.94%	1.46%	0.24%	3.64%
013	46862	-12.93%	34989	8048	23.00%	21809	62.33%	25.00%	3.48%	1.42%	29.90%
014	58382	8.48%	42604	2889	6.78%	37521	88.07%	8.42%	1.89%	0.73%	11.04%
015	58888	9.42%	43711	5183	11.86%	34525	78.98%	10.74%	2.08%	0.47%	13.29%
016	49562	-7.91%	36585	3956	10.81%	29311	80.12%	10.52%	2.68%	0.53%	13.73%
017	79395	47.52%	55950	7196	12.86%	46005	82.23%	12.35%	2.68%	0.86%	15.89%
018	52188	-3.03%	39974	7524	18.82%	29521	73.85%	17.87%	2.40%	0.43%	20.70%
019	73319	36.23%	51264	9537	18.60%	38478	75.06%	15.72%	2.63%	0.31%	18.66%
020	51632	-4.07%	37431	2521	6.74%	30225	80.75%	5.80%	4.12%	0.87%	10.79%
021	75926	41.07%	55388	2236	4.04%	47686	86.09%	3.84%	3.15%	0.79%	7.78%
022	78834	46.48%	56710	3920	6.91%	46373	81.77%	5.88%	3.81%	1.66%	11.35%
023	79982	48.61%	56739	1350	2.38%	48296	85.12%	1.83%	3.50%	1.44%	6.77%
024	80448	49.48%	54766	1809	3.30%	42537	77.67%	2.74%	3.64%	4.58%	10.96%
025	64506	19.86%	47470	2542	5.35%	37453	78.90%	4.65%	5.13%	2.03%	11.81%
026	53090	-1.36%	36840	5519	14.98%	15589	42.32%	21.74%	9.99%	1.32%	33.05%
027	56960	5.83%	42735	696	1.63%	39062	91.41%	2.10%	2.50%	0.46%	5.06%
028	50491	-6.19%	38571	2716	7.04%	34181	86.62%	6.86%	0.84%	0.56%	8.26%
029	49432	-8.15%	38269	4833	12.63%	31950	83.49%	13.01%	0.68%	0.34%	14.03%
030	47974	-10.86%	36289	6275	17.29%	28241	77.82%	17.36%	1.36%	0.06%	18.78%
031	69009	28.22%	49585	4024	8.12%	38213	77.08%	8.33%	5.26%	1.09%	14.68%
032	62747	16.59%	48430	8198	16.93%	34440	71.11%	14.16%	3.97%	3.21%	21.34%
033	53275	-1.01%	38833	16835	43.35%	17965	46.26%	41.19%	4.22%	1.05%	46.46%
034	53448	-0.69%	40414	10579	26.18%	22680	56.12%	24.25%	5.01%	4.13%	33.39%
035	59596	10.73%	42843	8982	20.96%	27287	63.69%	17.92%	4.59%	4.21%	26.72%
036	60005	11.49%	42081	4949	11.76%	34345	81.62%	11.99%	3.17%	1.97%	17.13%
037	48429	-10.02%	34277	10861	31.69%	14861	43.36%	36.45%	6.29%	2.21%	44.95%
038	46017	-14.50%	35099	10132	28.87%	17031	48.52%	30.65%	4.90%	2.38%	37.93%
039	55169	2.51%	39079	19758	50.56%	12545	32.10%	55.04%	4.25%	0.71%	60.00%
040	43063	-19.99%	33244	13427	40.39%	11084	33.34%	43.64%	5.40%	1.86%	50.90%
041	46462	-13.67%	36711	7802	21.25%	22524	61.35%	20.35%	3.17%	2.64%	26.16%
042	47472	-11.79%	36018	3663	10.17%	27016	75.01%	10.42%	4.19%	4.88%	19.49%
043	45632	-15.21%	33625	2655	7.90%	27194	80.87%	8.91%	3.22%	3.82%	15.95%
044	45368	-15.70%	35342	19904	56.32%	12147	34.37%	60.99%	2.18%	1.23%	64.40%
045	44413	-17.48%	32267	1162	3.60%	27501	85.23%	2.80%	1.96%	4.87%	9.63%
046	65510	21.72%	46825	4010	8.56%	35888	76.64%	7.95%	3.23%	3.78%	14.96%
047	56500	4.98%	40342	5106	12.66%	24427	60.55%	12.96%	4.95%	4.14%	22.05%
048	51396	-4.50%	40407	10334	25.57%	24345	60.25%	20.81%	3.29%	1.16%	25.26%
049	47374	-11.98%	35248	4620	13.11%	24014	68.13%	12.01%	2.71%	5.57%	20.29%
050	59352	10.28%	40370	3964	9.82%	23357	57.86%	12.30%	3.64%	13.95%	29.89%
051	46765	-13.11%	33975	3454	10.17%	22658	66.69%	10.90%	2.97%	10.01%	23.88%
052	49183	-8.62%	38972	5289	13.57%	26347	67.60%	12.25%	2.73%	2.68%	17.66%
053	41467	-22.95%	30928	18197	58.84%	10585	34.22%	61.68%	1.63%	0.82%	64.13%
054	54106	0.53%	43620	4281	9.81%	34302	78.64%	8.94%	1.95%	2.35%	13.24%
055	40898	-24.01%	33659	20387	60.57%	11146	33.11%	60.8%	2.14%	1.56%	64.47%
056	51,785	-3.78%	46,504	22239	47.82%	17,335	37.28%	44.94%	3.50%	4.14%	52.58%
057	51,069	-5.11%	43,585	6082	13.95%	30,250	69.40%	12.83%	3.58%	3.43%	19.84%
058	41,038	-23.75%	33,528	17725	52.87%	13,283	39.62%	57.52%	3.48%	1.35%	62.35%
059	48,474	-9.93%	40,157	21356	53.18%	15,516	38.64%	49.18%	2.26%	3.72%	55.16%
060	39,431	-26.74%	28,011	18077	64.54%	4,609	16.45%	69.85%	5.67%	3.45%	78.97%
061	37,096	-31.07%	27,859	21958	78.82%	3,946	14.16%	80.63%	3.64%	0.80%	85.07%
062	37,690	-29.97%	27,743	18555	66.88%	3,705	13.35%	74.40%	5.19%	2.75%	82.34%
063	70,816	31.58%	50,701	36090	71.18%	12,573	24.80%	69.14%	2.07%	1.05%	72.26%
064	57,109	6.11%	42,058	28748	68.35%	10,086	23.98%	68.59%	2.13%	0.55%	71.27%
065	75,570	40.41%	52,942	42618	80.50%	7,297	13.78%	81.79%	2.17%	0.35%	84.31%
066	61,283	13.87%	43,745	30289	69.24%	10,715	24.49%	68.55%	2.23%	1.10%	71.88%
067	63,519	18.02%	45,888	15971	34.80%	26,342	57.40%	32.36%	2.42%	1.10%	35.88%
068	65,624	21.93%	47,428	7221	15.23%	37,625	79.33%	14.72%	1.44%	0.57%	16.73%

## Population Summary Report -- 2010 Census

## Georgia State House -2006 Benchmark Plan

District	2010 Pop.	% 2010		18+ AP	% 18+ AP	18+ NH	% 18+ NH	2006-2010	2006-2010	2006-2010	2006-2010
		Deviation	18+ Pop								B+L+A
				Black	Black	White	White	BCVAP*	LCVAP*	ACVAP*	CVAP*
069	51,692	-3.95%	38,652	5767	14.92%	31,227	80.79%	15.40%	0.73%	0.39%	16.52%
070	69,309	28.78%	50,441	11814	23.42%	33,652	66.72%	23.59%	3.37%	0.99%	27.95%
071	59,721	10.96%	43,305	3938	9.09%	36,630	84.59%	9.60%	2.43%	0.96%	12.99%
072	52,644	-2.19%	38,144	4900	12.85%	29,056	76.17%	11.31%	3.37%	1.86%	16.54%
073	69,207	28.59%	50,075	11346	22.66%	35,776	71.44%	19.98%	2.57%	0.88%	23.43%
074	48,881	-9.18%	36,170	24836	68.66%	8,156	22.55%	67.74%	1.79%	2.60%	72.13%
075	42,907	-20.28%	30,255	17091	56.49%	5,575	18.43%	64.77%	4.02%	6.04%	74.83%
076	57,823	7.44%	41,508	27253	65.66%	7,676	18.49%	66.00%	4.71%	4.35%	75.06%
077	47,484	-11.77%	33,575	23354	69.56%	6,908	20.57%	68.07%	3.79%	2.78%	74.64%
078	65,593	21.87%	47,023	28287	60.16%	13,377	28.45%	60.81%	3.26%	2.36%	66.43%
079	53,290	-0.98%	41,045	6362	15.50%	25,432	61.96%	12.58%	2.58%	6.05%	21.21%
080	48,878	-9.18%	39,772	5312	13.36%	22,512	56.60%	13.75%	3.81%	4.85%	22.41%
081	42,977	-20.15%	33,299	3963	11.90%	10,850	32.58%	13.76%	10.07%	9.03%	32.86%
082	47,958	-10.89%	37,519	8141	21.70%	20,385	54.33%	20.53%	6.10%	5.92%	32.55%
083	50,049	-7.01%	41,295	4192	10.15%	30,213	73.16%	9.08%	3.35%	5.31%	17.74%
084	40,447	-24.85%	31,639	19111	60.40%	11,435	36.14%	61.95%	1.39%	0.93%	64.27%
085	40,501	-24.75%	31,496	18029	57.24%	11,530	36.61%	60.93%	2.05%	1.09%	64.07%
086	40,885	-24.03%	29,654	18066	60.92%	6,176	20.83%	63.58%	1.83%	5.24%	70.65%
087	41,980	-22.00%	31,129	22600	72.60%	5,339	17.15%	73.15%	2.77%	2.33%	78.25%
088	47,769	-11.24%	34,892	22898	65.63%	9,172	26.29%	67.74%	1.42%	1.96%	71.12%
089	40,729	-24.32%	30,790	27652	89.81%	2,128	6.91%	89.81%	1.56%	1.12%	92.49%
090	57,061	6.02%	41,103	30855	75.07%	7,986	19.43%	74.05%	2.06%	0.97%	77.08%
091	53,881	0.11%	39,868	26160	65.62%	12,215	30.64%	63.11%	2.12%	0.91%	66.14%
092	51,040	-5.17%	37,798	26340	69.69%	10,346	27.37%	68.10%	1.18%	1.34%	70.62%
093	63,530	18.04%	45,221	36205	80.06%	7,604	16.82%	76.58%	1.23%	0.75%	78.56%
094	58,376	8.47%	41,057	28692	69.88%	7,728	18.82%	72.53%	1.98%	0.62%	75.13%
095	71,086	32.08%	50,283	25660	51.03%	20,694	41.16%	44.40%	2.93%	2.17%	49.50%
096	47,685	-11.40%	34,141	8866	25.97%	7,561	22.15%	36.99%	12.34%	10.46%	59.79%
097	61,275	13.85%	45,595	7147	15.67%	21,480	47.11%	17.34%	4.58%	14.06%	35.98%
098	84,580	57.15%	58,276	6743	11.57%	37,380	64.14%	11.62%	5.69%	6.57%	23.88%
099	47,838	-11.11%	33,004	7666	23.23%	4,599	13.93%	41.74%	17.01%	12.33%	71.08%
100	55,568	3.25%	38,618	12411	32.14%	7,372	19.09%	39.21%	13.06%	10.65%	62.92%
101	55,596	3.30%	39,665	7278	18.35%	20,429	51.50%	16.89%	7.05%	11.26%	35.20%
102	50,560	-6.06%	37,270	6111	16.40%	19,086	51.21%	15.97%	6.14%	11.57%	33.68%
103	57,269	6.41%	40,722	9175	22.53%	18,989	46.63%	23.12%	7.59%	10.01%	40.72%
104	66,935	24.37%	47,629	14523	30.49%	20,938	43.96%	27.87%	7.26%	5.99%	41.12%
105	91,944	70.84%	63,507	10510	16.55%	42,687	67.22%	15.30%	4.91%	4.52%	24.73%
106	50,087	-6.94%	36,330	10691	29.43%	21,003	57.81%	26.47%	3.02%	3.25%	32.74%
107	90,144	67.49%	62,752	16786	26.75%	39,288	62.61%	24.06%	2.92%	2.47%	29.45%
108	68,282	26.87%	49,007	5593	11.41%	38,041	77.62%	10.77%	3.60%	2.27%	16.64%
109	78,421	45.71%	55,731	21175	38.00%	29,198	52.39%	35.56%	3.50%	3.12%	42.18%
110	80,088	48.81%	56,093	14421	25.71%	39,247	69.97%	23.66%	2.57%	0.31%	26.54%
111	62,275	15.71%	45,634	7639	16.74%	36,211	79.35%	17.38%	1.20%	0.26%	18.84%
112	57,345	6.55%	42,441	11922	28.09%	28,561	67.30%	26.72%	1.32%	1.09%	29.13%
113	56,617	5.20%	42,230	4414	10.45%	34,830	82.48%	11.67%	1.89%	1.44%	15.00%
114	53,145	-1.25%	41,537	14028	33.77%	21,233	51.12%	37.62%	3.56%	0.67%	41.85%
115	50,009	-7.08%	43,816	7067	16.13%	31,025	70.81%	13.87%	2.46%	4.85%	21.18%
116	49,355	-8.30%	38,392	12575	32.75%	23,833	62.08%	34.06%	1.42%	0.20%	35.68%
117	64,224	19.33%	47,253	9476	20.05%	34,263	72.51%	20.72%	3.34%	1.15%	25.21%
118	60,824	13.01%	44,221	5565	12.58%	34,204	77.35%	11.24%	2.64%	4.24%	18.12%
119	46,117	-14.31%	36,747	8043	21.89%	25,662	69.83%	19.89%	1.61%	2.13%	23.63%
120	49,471	-8.08%	37,379	22821	61.05%	12,062	32.27%	60.90%	2.36%	1.10%	64.36%
121	39,901	-25.86%	29,890	19292	64.54%	9,527	31.87%	64.04%	1.69%	0.37%	66.10%
122	45,723	-15.04%	33,052	18144	54.90%	13,307	40.26%	53.61%	3.15%	1.50%	58.26%
123	49,250	-8.49%	35,851	17946	50.06%	15,378	42.89%	48.34%	3.99%	1.29%	53.62%
124	45,898	-14.72%	35,277	15372	43.58%	19,059	54.03%	46.56%	0.70%	0.16%	47.42%
125	54,944	2.09%	41,495	11301	27.23%	28,902	69.65%	28.42%	0.68%	0.30%	29.40%
126	48,971	-9.01%	36,905	14100	38.21%	21,077	57.11%	37.99%	1.55%	0.47%	40.01%
127	50,054	-7.00%	37,947	8056	21.23%	28,899	76.16%	20.26%	0.65%	0.28%	21.19%
128	46,413	-13.76%	34,272	14991	43.74%	17,980	52.46%	45.26%	0.74%	0.10%	46.10%
129	53,120	-1.30%	40,339	7156	17.74%	31,282	77.55%	17.61%	1.61%	1.21%	20.43%
130	50,024	-7.05%	36,257	18142	50.04%	15,351	42.34%	43.57%	5.52%	1.49%	50.58%
131	54,525	1.31%	41,455	7117	17.17%	30,017	72.41%	17.25%	5.03%	2.09%	24.37%
132	42,799	-20.48%	31,341	19080	60.88%	9,735	31.06%	59.11%	2.16%	0.82%	62.09%
133	39,441	-26.72%	29,843	19452	65.18%	8,591	28.79%	68.23%	2.91%	0.93%	72.07%
134	47,935	-10.93%	35,769	15318	42.82%	18,320	51.22%	44.38%	1.72%	0.65%	46.75%
135	48,898	-9.15%	38,140	22574	59.19%	13,650	35.79%	61.42%	1.64%	0.12%	63.18%
136	56,696	5.34%	43,280	8935	20.64%	31,648	73.12%	19.72%	1.62%	1.29%	22.63%

## Population Summary Report -- 2010 Census

## Georgia State House -2006 Benchmark Plan

												2006-2010
		% 2010		18+ AP	% 18+ AP	18+_NH	% 18+ NH	2006-2010	2006-2010	2006-2010		
District	2010 Pop.	Deviation	18+ Pop	Black	Black	White	White	BCVAP*	LCVAP*	ACVAP*	B+L+A CVAP*	
137	49,858	-7.36%	38,238	8287	21.67%	27,905	72.98%	20.86%	1.82%	1.44%	24.12%	
138	43,715	-18.78%	30,581	23340	76.32%	6,383	20.87%	73.58%	1.04%	1.28%	75.90%	
139	41,191	-23.47%	31,048	20686	66.63%	9,219	29.69%	65.66%	1.40%	0.42%	67.48%	
140	46,613	-13.39%	35,260	11519	32.67%	22,449	63.67%	34.34%	0.38%	0.23%	34.95%	
141	46,542	-13.52%	37,053	14053	37.93%	21,650	58.43%	38.86%	1.30%	0.82%	40.98%	
142	45,637	-15.20%	34,786	17778	51.11%	16,093	46.26%	51.70%	0.83%	0.13%	52.66%	
143	48,983	-8.99%	36,401	12232	33.60%	22,917	62.96%	33.51%	0.87%	0.84%	35.22%	
144	51,000	-5.24%	39,811	11679	29.34%	26,689	67.04%	30.47%	1.33%	0.71%	32.51%	
145	43,689	-18.82%	32,006	12280	38.37%	16,489	51.52%	35.58%	3.74%	1.36%	40.68%	
146	67,028	24.54%	49,041	11315	23.07%	33,557	68.43%	22.96%	3.34%	1.77%	28.07%	
147	54,428	1.13%	40,360	13885	34.40%	24,780	61.40%	34.48%	1.33%	0.44%	36.25%	
148	41,718	-22.49%	31,587	11460	36.28%	16,935	53.61%	39.43%	3.61%	0.51%	43.55%	
149	43,458	-19.25%	33,352	15281	45.82%	17,313	51.91%	46.51%	0.47%	0.06%	47.04%	
150	45,353	-15.73%	33,671	21800	64.74%	11,080	32.91%	64.74%	0.70%	0.64%	66.08%	
151	45,471	-15.51%	33,759	22061	65.35%	10,505	31.12%	63.81%	1.24%	0.11%	65.16%	
152	47,091	-12.50%	34,628	8293	23.95%	24,924	71.98%	22.97%	1.55%	0.33%	24.85%	
153	46,273	-14.02%	34,366	10607	30.86%	20,745	60.36%	32.10%	2.74%	0.80%	35.64%	
154	51,008	-5.22%	39,422	12655	32.10%	23,869	60.55%	33.41%	1.91%	0.04%	35.36%	
155	47,362	-12.00%	34,870	8436	24.19%	23,802	68.26%	24.80%	3.30%	0.20%	28.30%	
156	51,000	-5.24%	38,630	11534	29.86%	24,659	63.83%	31.67%	1.42%	0.32%	33.41%	
157	49,943	-7.20%	36,594	10767	29.42%	24,790	67.74%	29.38%	0.82%	0.32%	30.52%	
158	57,393	6.64%	45,709	10912	23.87%	32,627	71.38%	22.17%	1.66%	0.68%	24.51%	
159	88,115	63.72%	64,439	13857	21.50%	45,132	70.04%	21.09%	2.82%	1.76%	25.67%	
160	46,989	-12.69%	36,334	17961	49.43%	14,623	40.25%	56.28%	2.51%	0.75%	59.54%	
161	41,990	-21.98%	31,829	20003	62.85%	10,576	33.23%	60.66%	1.01%	1.41%	63.08%	
162	43,327	-19.50%	33,811	18243	53.96%	13,176	38.97%	57.18%	2.18%	0.89%	60.25%	
163	48,341	-10.18%	39,112	2493	6.37%	34,134	87.27%	5.34%	2.19%	2.53%	10.06%	
164	53,854	0.06%	40,320	9140	22.67%	27,839	69.05%	20.02%	3.63%	1.57%	25.22%	
165	49,717	-7.62%	35,042	17125	48.87%	13,955	39.82%	48.82%	7.31%	1.79%	57.92%	
166	46,202	-14.15%	34,325	10180	29.66%	20,585	59.97%	29.82%	3.67%	0.37%	33.86%	
167	61,709	14.66%	46,170	9371	20.30%	33,843	73.31%	19.67%	3.01%	0.35%	23.03%	
168	50,780	-5.65%	37,374	5538	14.82%	28,963	77.50%	16.15%	1.37%	0.36%	17.88%	
169	51,596	-4.13%	37,866	9307	24.58%	24,359	64.33%	26.41%	4.79%	0.00%	31.20%	
170	51,371	-4.55%	37,446	5775	15.42%	27,308	72.93%	16.45%	3.22%	0.23%	19.90%	
171	45,696	-15.09%	33,797	13397	39.64%	17,723	52.44%	42.60%	2.19%	0.22%	45.01%	
172	45,097	-16.21%	33,655	12478	37.08%	18,732	55.66%	38.35%	1.61%	0.31%	40.27%	
173	48,578	-9.74%	36,298	11418	31.46%	23,323	64.25%	32.04%	1.13%	0.42%	33.59%	
174	48,740	-9.44%	36,612	9229	25.21%	24,644	67.31%	25.84%	2.00%	0.33%	28.17%	
175	51,199	-4.87%	40,097	18524	46.35%	19,044	47.49%	46.11%	2.01%	0.99%	49.11%	
176	56,994	5.90%	40,970	9615	23.47%	28,860	70.44%	23.86%	1.69%	0.81%	26.36%	
177	48,483	-9.92%	37,284	10650	28.56%	25,092	67.30%	28.65%	0.86%	0.10%	29.61%	
178	53,771	-0.09%	40,100	5233	13.05%	32,815	81.83%	13.69%	2.05%	0.34%	16.08%	
179	46,872	-12.91%	35,760	11570	32.35%	21,308	59.59%	33.60%	1.85%	0.47%	35.92%	
180	54,520	1.30%	39,679	7503	18.91%	29,425	74.16%	18.34%	3.84%	1.39%	23.57%	

Total  
2010

Pop.	9,687,653	101.91%	7,196,101	2,140,789	29.75%	4,242,514	58.96%
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## CVAP Source:

\* 2006-110 ACS Special Tabulation

Note: Citizen Voting Age Population (CVAP) percentages are disaggregated from block-group level ACS estimates (with a survey midpoint of July 2017)

**Population Summary Report -- 2010 Census****Georgia State House -2006 Benchmark Plan**

District	2010 Pop.	% 2010 Deviation	18+ Pop	18+ AP Black	% 18+ AP Black	18+_NH White	% 18+ NH White	2006-2010 BCVAP*	2006-2010 LCVAP*	2006-2010 ACVAP*	2006-2010
											B+L+A CVAP*

**CVAP Source:**

\* 2006-10 ACS Special Tabulation

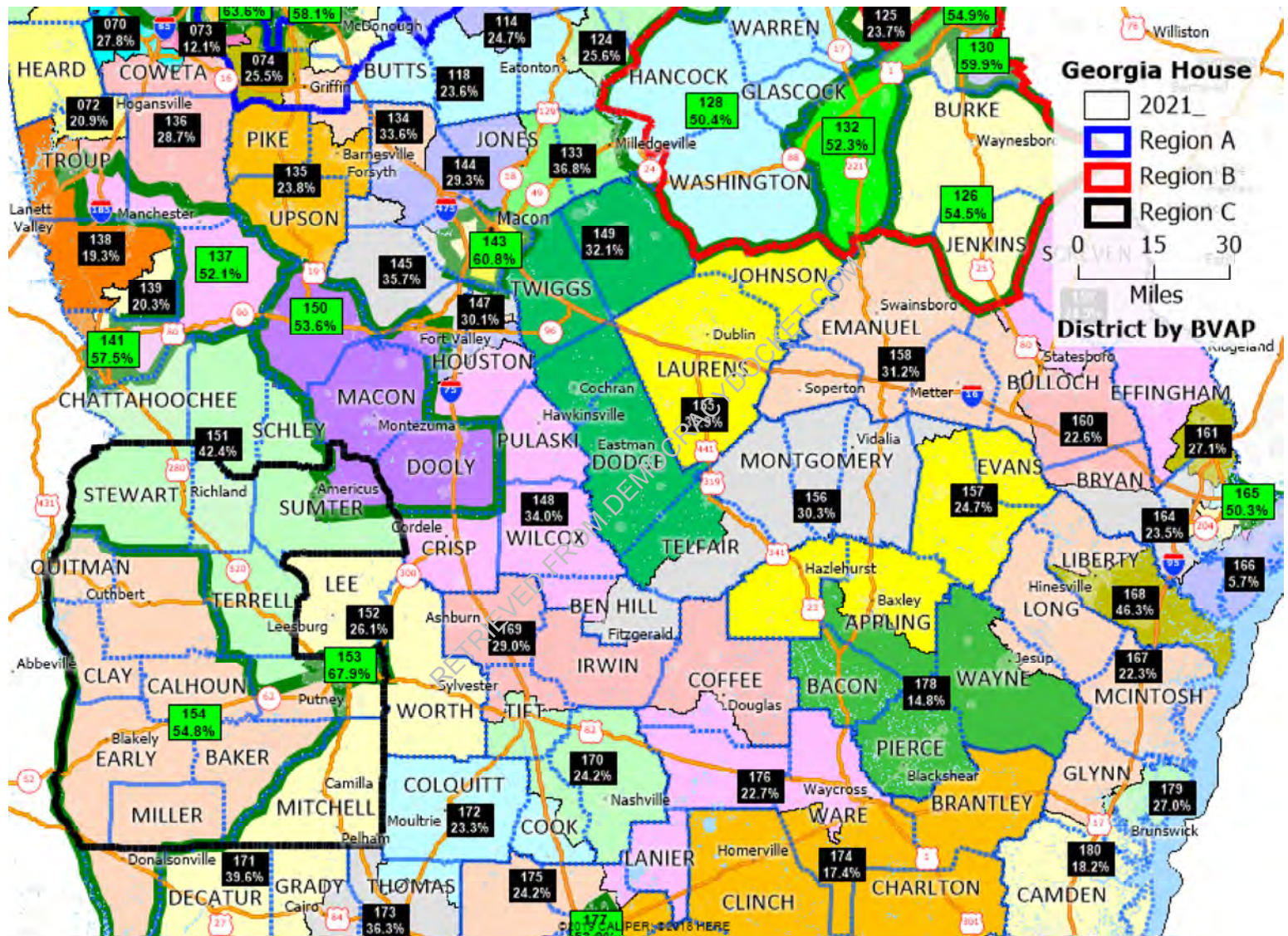
Note: Citizen Voting Age Population (CVAP) percentages are disaggregated from block-group level ACS estimates (with a survey midpoint of July 2017)

RETRIEVED FROM DEMOCRACYDOCKET.COM



# EXHIBIT X

RETRIEVED FROM DEMOCRACYDOCKET.COM



# **EXHIBIT A**

## **Part 3**

RETRIEVED FROM DEMOCRACYDOCKET.COM

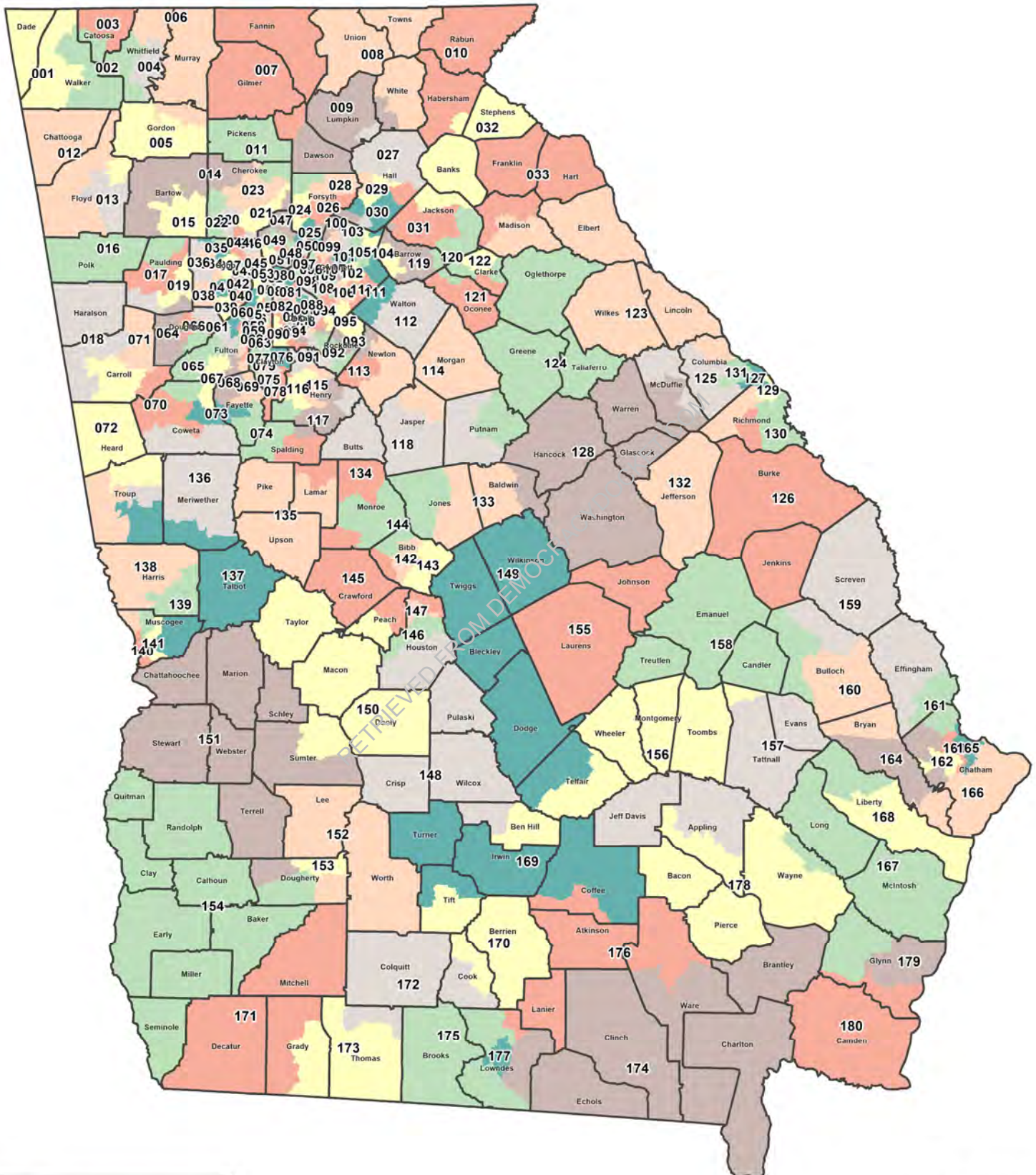
# EXHIBIT Y-1

RETRIEVED FROM DEMOCRACYDOCKET.COM



# Proposed Georgia House Districts

Client: H097  
Plan: House-prop1-2021  
Type: House



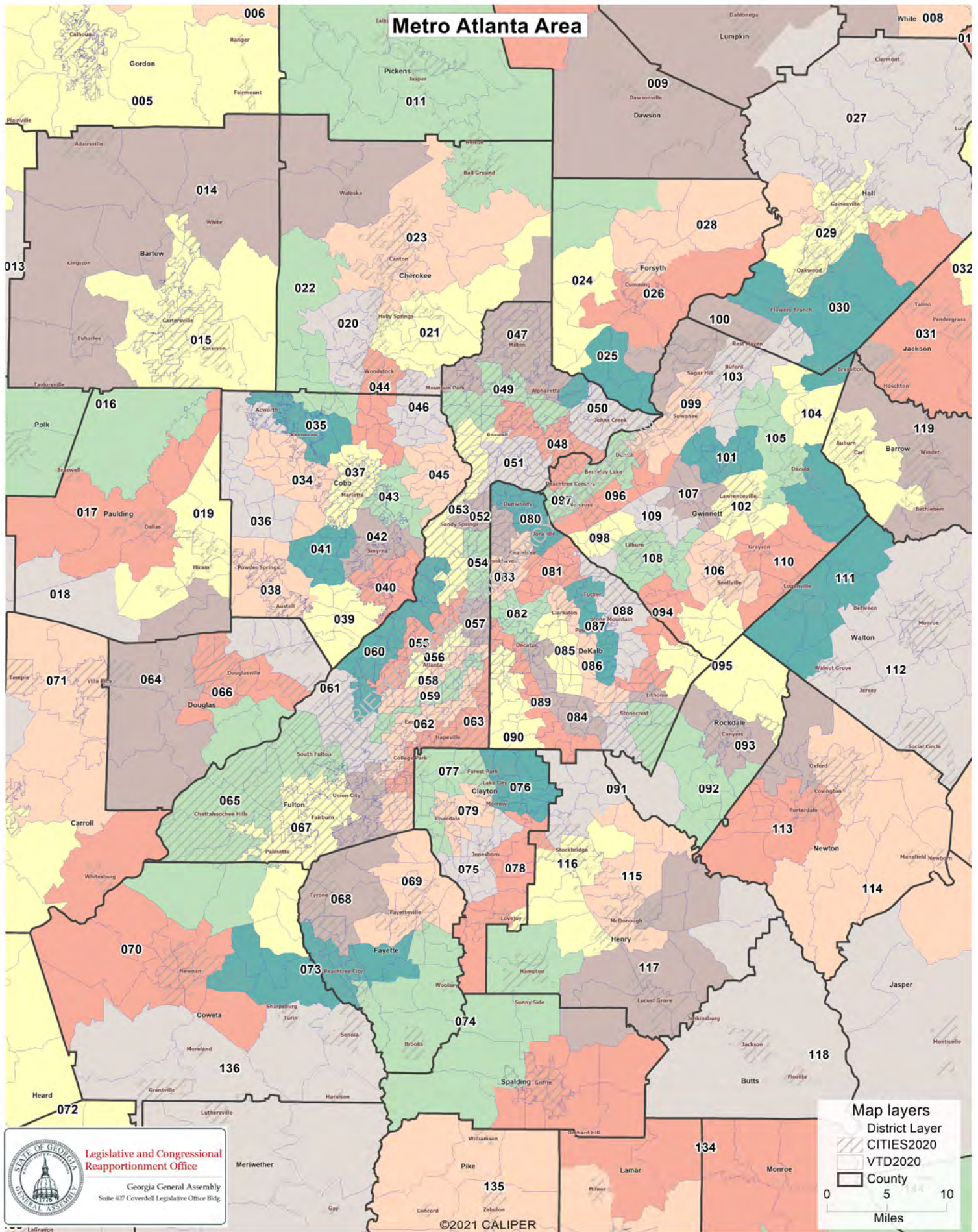
©2021 CALIPER

Map layers  
District Layer  
County  
0 20 40  
Miles

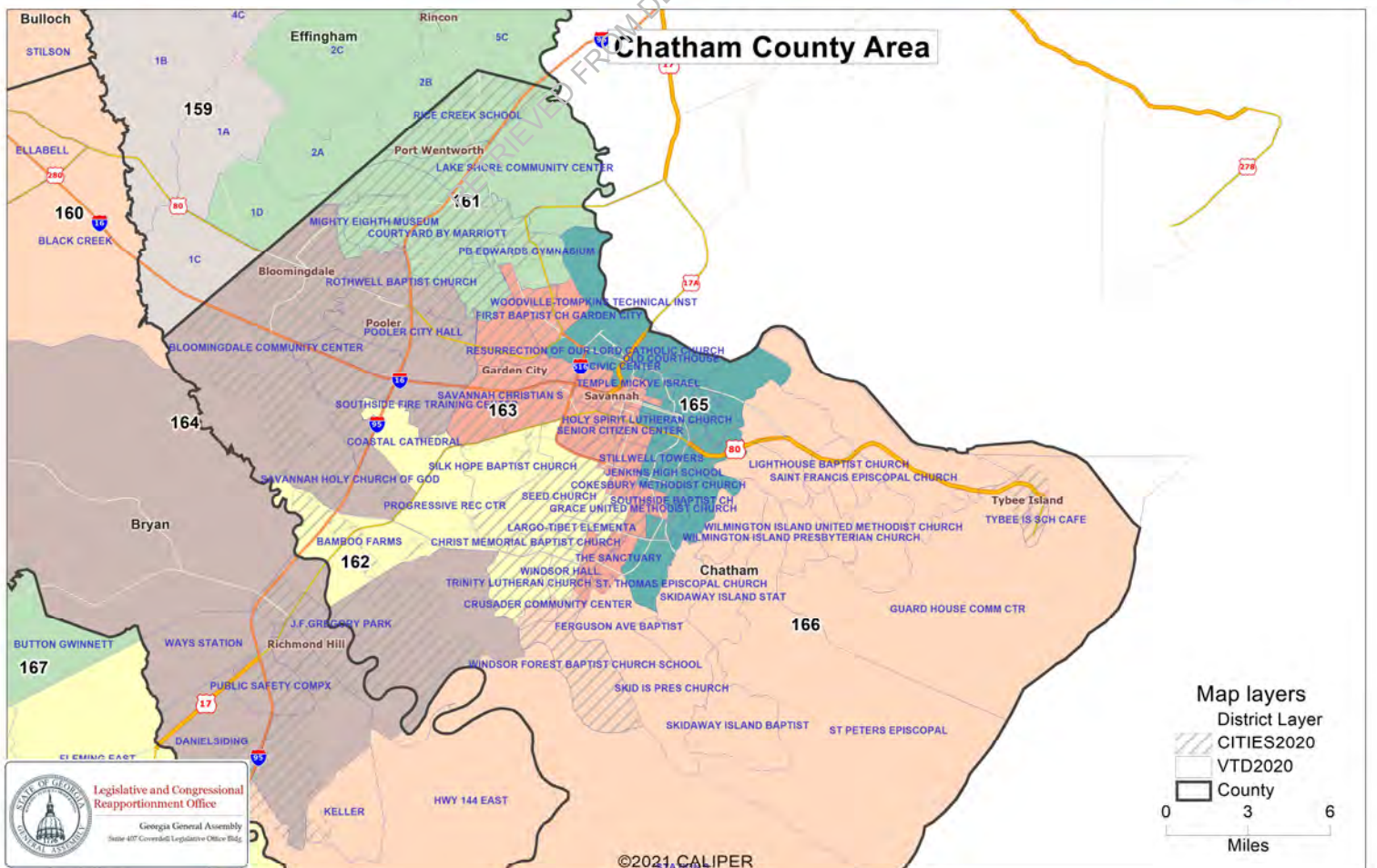


# Proposed Georgia House Districts

Client: H097  
Plan: House-prop1-2021  
Type: House

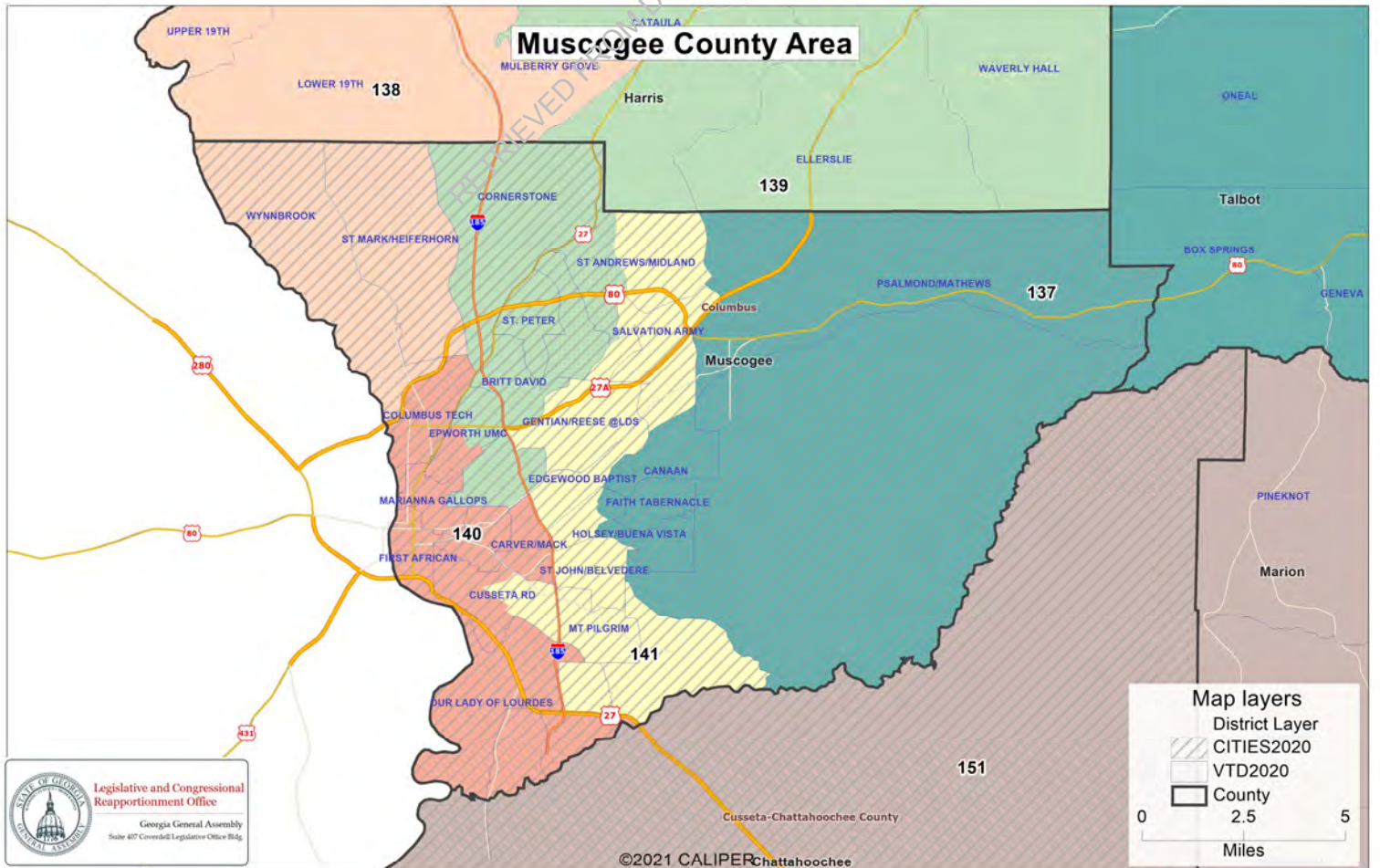




[illegible]



## Bibb County Area



User: H097

Plan Name: House-prop1-2021

Plan Type: House

## Population Summary

### Summary Statistics:

Population Range: 58,678 to 60,308  
 Ratio Range: 0.03  
 Absolute Range: -833 to 797  
 Absolute Overall Range: 1,630  
 Relative Range: -1.40% to 1.34%  
 Relative Overall Range: 2.74%  
 Absolute Mean Deviation: 363.71  
 Relative Mean Deviation: 0.61%  
 Standard Deviation: 417.67

District	Population	Deviation	% Devn.	[18+ _Pop]	[% 18+ _Pop]	[% NH_Wht]	[% NH_Blkl]	[% Hispanic Origin]	[% NH_Asn]	[% NH_Ind]	[% NH_Hwn]	[% NH_Oth]	[% NH_2+ Races]
001	59,666	155	0.26%	46,801	78.44%	87.88%	3.9%	2.59%	0.53%	0.31%	0.04%	0.3%	4.45%
002	59,773	262	0.44%	46,159	77.22%	83.24%	2.56%	9.09%	1.1%	0.18%	0.02%	0.26%	3.55%
003	60,199	688	1.16%	46,716	77.6%	86.9%	2.82%	3.6%	1.63%	0.27%	0.14%	0.18%	4.46%
004	59,070	-441	-0.74%	42,798	72.45%	42.01%	4.17%	50.07%	1.23%	0.17%	0.02%	0.28%	2.05%
005	58,837	-674	-1.13%	44,623	75.84%	75.46%	3.76%	15.29%	1.24%	0.2%	0.02%	0.22%	3.81%
006	59,712	201	0.34%	45,152	75.62%	80.15%	1.01%	14.51%	0.51%	0.2%	0.01%	0.2%	3.4%
007	59,081	-430	-0.72%	48,771	82.55%	87.97%	0.37%	7.43%	0.45%	0.26%	0.01%	0.24%	3.27%
008	59,244	-267	-0.45%	49,612	83.74%	90.8%	1.13%	3.21%	0.54%	0.3%	0.01%	0.34%	3.67%
009	59,474	-37	-0.06%	48,273	81.17%	87.78%	1.01%	5.49%	0.79%	0.37%	0.06%	0.36%	4.15%
010	59,519	8	0.01%	47,164	79.24%	78.61%	2.97%	13.11%	1.51%	0.17%	0.06%	0.24%	3.33%
011	58,792	-719	-1.21%	45,396	77.21%	87.43%	1.55%	5.33%	1.15%	0.22%	0.02%	0.3%	4%
012	59,300	-211	-0.35%	46,487	78.39%	78.45%	8.61%	7.68%	1.01%	0.16%	0.01%	0.42%	3.68%
013	59,150	-361	-0.61%	45,176	76.38%	62.24%	18.71%	13.52%	1.29%	0.22%	0.03%	0.33%	3.65%
014	59,135	-376	-0.63%	45,511	76.96%	81.38%	5.86%	7.04%	0.77%	0.21%	0.03%	0.34%	4.36%
015	59,213	-298	-0.50%	45,791	77.33%	68.38%	13.61%	11.74%	1.3%	0.25%	0.04%	0.49%	4.19%
016	59,402	-109	-0.18%	44,009	74.09%	72.9%	11.15%	10.95%	0.76%	0.22%	0.05%	0.43%	3.54%
017	59,120	-391	-0.66%	42,761	72.33%	63.28%	22.06%	7.9%	1.33%	0.23%	0.07%	0.64%	4.49%
018	59,335	-176	-0.30%	45,159	76.11%	84.78%	7.11%	2.93%	0.59%	0.23%	0.04%	0.35%	3.97%
019	58,955	-556	-0.93%	44,299	75.14%	62.06%	23.47%	7.87%	1.14%	0.25%	0.08%	0.64%	4.49%
020	60,107	596	1.00%	45,725	76.07%	73.93%	8.13%	10.6%	1.97%	0.16%	0.04%	0.63%	4.54%
021	59,529	18	0.03%	44,931	75.48%	80.04%	4.29%	8.54%	1.84%	0.19%	0.04%	0.66%	4.4%
022	59,460	-51	-0.09%	45,815	77.05%	62.53%	13.94%	13.26%	3.86%	0.2%	0.03%	0.81%	5.37%
023	59,048	-463	-0.78%	44,254	74.95%	71.47%	5.64%	17.19%	1.06%	0.22%	0.04%	0.36%	4.01%
024	59,011	-500	-0.84%	41,814	70.86%	60.13%	6%	11.36%	17.65%	0.21%	0.04%	0.62%	3.98%
025	59,414	-97	-0.16%	42,520	71.57%	51.99%	5%	5.42%	33.55%	0.15%	0.03%	0.51%	3.36%
026	59,248	-263	-0.44%	44,081	74.4%	63.48%	3.29%	12.07%	16.8%	0.18%	0.04%	0.5%	3.64%
027	58,795	-716	-1.20%	46,004	78.24%	79.69%	3.22%	11.82%	0.82%	0.19%	0.04%	0.3%	3.91%
028	58,972	-539	-0.91%	44,444	75.36%	76.5%	3.39%	13.59%	2.06%	0.16%	0.03%	0.4%	3.86%
029	59,200	-311	-0.52%	43,131	72.86%	36.05%	12.13%	46.28%	2.72%	0.12%	0.06%	0.41%	2.23%

## Population Summary

House-prop1-2021

District	Population	Deviation	% Devn.	[18+_Pop]	[% 18+_Pop]	[% NH_Wht]	[% NH_Blkl]	[% Hispanic Origin]	[% NH_Asn]	[% NH_Ind]	[% NH_Hwn]	[% NH_Oth]	[% NH_2+ Races]
030	59,266	-245	-0.41%	45,414	76.63%	67.03%	7.37%	18.78%	3.04%	0.15%	0.03%	0.34%	3.26%
031	59,901	390	0.66%	43,120	71.99%	65.57%	6.64%	21.63%	2.27%	0.19%	0.02%	0.37%	3.31%
032	59,145	-366	-0.62%	45,942	77.68%	80.8%	7.24%	6.03%	1.26%	0.29%	0.05%	0.25%	4.09%
033	59,187	-324	-0.54%	46,498	78.56%	79.94%	10.97%	4.08%	1.2%	0.15%	0.01%	0.36%	3.29%
034	59,875	364	0.61%	45,758	76.42%	66.59%	14.46%	9.06%	4.41%	0.11%	0.04%	0.68%	4.65%
035	59,889	378	0.64%	48,312	80.67%	50.12%	26.55%	12.7%	4.43%	0.21%	0.04%	0.9%	5.04%
036	59,994	483	0.81%	44,911	74.86%	68.01%	16.01%	7.46%	3.07%	0.14%	0.03%	0.73%	4.55%
037	59,176	-335	-0.56%	46,223	78.11%	42.2%	26%	21.96%	4.5%	0.21%	0.03%	1%	4.11%
038	59,317	-194	-0.33%	44,839	75.59%	25.93%	52.72%	14.72%	1.77%	0.22%	0.07%	0.7%	3.88%
039	59,381	-130	-0.22%	44,436	74.83%	20.6%	52.08%	21.79%	1.5%	0.14%	0.03%	0.65%	3.2%
040	59,044	-467	-0.78%	47,976	81.25%	48.94%	30.78%	6.43%	8.54%	0.17%	0.02%	0.7%	4.43%
041	60,122	611	1.03%	45,271	75.3%	23.42%	36.44%	33.22%	2.81%	0.18%	0.05%	0.86%	3.02%
042	59,620	109	0.18%	48,525	81.39%	35.47%	31.18%	20.49%	7.11%	0.19%	0.03%	1.15%	4.37%
043	59,464	-47	-0.08%	47,033	79.09%	43.32%	24.35%	15.85%	7.83%	0.21%	0.09%	2.4%	5.96%
044	60,002	491	0.83%	46,773	77.95%	64.71%	10.98%	11.99%	5.71%	0.18%	0.02%	1.17%	5.24%
045	59,738	227	0.38%	44,023	73.69%	72.29%	4.14%	5.5%	12.94%	0.07%	0.02%	0.67%	4.38%
046	59,108	-403	-0.68%	44,132	74.66%	72.43%	6.76%	8.24%	6.93%	0.12%	0.04%	0.82%	4.66%
047	59,126	-385	-0.65%	43,932	74.3%	61.71%	9.44%	7.83%	15.91%	0.2%	0.03%	0.7%	4.17%
048	59,003	-508	-0.85%	44,779	75.89%	59.05%	10.16%	14.1%	11.77%	0.08%	0.05%	0.64%	4.16%
049	59,153	-358	-0.60%	45,263	76.52%	68.94%	7.2%	7.56%	11.41%	0.1%	0.02%	0.68%	4.09%
050	59,523	12	0.02%	43,940	73.82%	41.55%	11.04%	7.06%	35.46%	0.09%	0.04%	0.66%	4.1%
051	58,952	-559	-0.94%	47,262	80.17%	51.02%	21.93%	15.47%	5.83%	0.17%	0.04%	1.03%	4.51%
052	59,811	300	0.50%	48,525	81.13%	53.81%	13.71%	7.98%	19.72%	0.14%	0.06%	0.72%	3.86%
053	59,953	442	0.74%	46,944	78.3%	70.3%	12.31%	8.2%	4.46%	0.1%	0.02%	0.63%	3.98%
054	60,083	572	0.96%	50,338	83.78%	61.03%	12.98%	15.17%	6.51%	0.14%	0.03%	0.57%	3.56%
055	59,971	460	0.77%	49,255	82.13%	33.78%	54.54%	5.14%	2.85%	0.18%	0.03%	0.4%	3.09%
056	58,929	-582	-0.98%	52,757	89.53%	34.03%	46.33%	5.81%	9.32%	0.18%	0.07%	0.45%	3.8%
057	59,969	458	0.77%	52,097	86.87%	62.89%	15.57%	8.83%	7.58%	0.11%	0.02%	0.65%	4.36%
058	59,057	-454	-0.76%	50,514	85.53%	24.98%	63.09%	5.03%	2.76%	0.14%	0.03%	0.51%	3.45%
059	59,434	-77	-0.13%	49,179	82.75%	19.37%	69.55%	4.45%	2.52%	0.16%	0.02%	0.56%	3.36%
060	59,709	198	0.33%	45,490	76.19%	26.72%	61.76%	5.87%	2.04%	0.17%	0.05%	0.44%	2.96%
061	59,302	-209	-0.35%	45,447	76.64%	14.79%	71.51%	9.1%	0.87%	0.15%	0.06%	0.54%	2.98%
062	59,450	-61	-0.10%	46,426	78.09%	17.17%	70.09%	7.61%	1.13%	0.21%	0.04%	0.53%	3.22%
063	59,381	-130	-0.22%	45,043	75.85%	16.74%	68%	10.42%	1.32%	0.21%	0.03%	0.51%	2.78%
064	58,986	-525	-0.88%	44,189	74.91%	54.76%	29.35%	8.84%	1.37%	0.27%	0.03%	0.78%	4.6%
065	59,464	-47	-0.08%	44,386	74.64%	29.55%	60.08%	5.23%	1.08%	0.18%	0.06%	0.57%	3.27%
066	59,047	-464	-0.78%	44,278	74.99%	29.98%	52.03%	11.05%	1.72%	0.24%	0.07%	0.79%	4.11%
067	59,135	-376	-0.63%	44,299	74.91%	29.09%	57.14%	8.71%	1.29%	0.18%	0.03%	0.5%	3.06%
068	59,477	-34	-0.06%	44,835	75.38%	31.15%	54.67%	7.3%	2.79%	0.16%	0.04%	0.7%	3.19%
069	58,682	-829	-1.39%	45,548	77.62%	24.1%	61.87%	6.47%	3.04%	0.17%	0.04%	0.89%	3.41%
070	59,121	-390	-0.66%	45,249	76.54%	56.51%	27.61%	9.08%	2.17%	0.2%	0.05%	0.47%	3.9%
071	59,538	27	0.05%	44,582	74.88%	67.15%	18.89%	7.44%	0.96%	0.25%	0.02%	0.51%	4.78%
072	59,660	149	0.25%	46,229	77.49%	67.26%	19.34%	8.16%	0.96%	0.2%	0.02%	0.3%	3.75%
073	60,036	525	0.88%	45,736	76.18%	69.92%	11.27%	7.96%	5.88%	0.15%	0.03%	0.52%	4.26%



## Population Summary

House-prop1-2021

District	Population	Deviation	% Devn.	[18+_Pop]	[% 18+_Pop]	[% NH_Wht]	[% NH_Blkl]	[% Hispanic Origin]	[% NH_Asn]	[% NH_Ind]	[% NH_Hwn]	[% NH_Oth]	[% NH_2+ Races]
074	58,956	-555	-0.93%	44,696	75.81%	61.32%	25.24%	6.67%	2.05%	0.2%	0.02%	0.52%	3.98%
075	59,743	232	0.39%	43,850	73.4%	9.24%	71.27%	12.97%	2.66%	0.19%	0.06%	0.71%	2.9%
076	59,759	248	0.42%	44,371	74.25%	8.61%	64.24%	15.61%	8.11%	0.19%	0.04%	0.57%	2.63%
077	59,242	-269	-0.45%	44,207	74.62%	6.22%	72.49%	14.22%	4.03%	0.22%	0.06%	0.5%	2.27%
078	59,044	-467	-0.78%	44,572	75.49%	12.69%	69.39%	9.94%	4.03%	0.19%	0.03%	0.65%	3.08%
079	59,500	-11	-0.02%	43,223	72.64%	5.69%	68.19%	18.11%	4.87%	0.21%	0.01%	0.57%	2.34%
080	59,461	-50	-0.08%	44,784	75.32%	45.02%	11.65%	26.17%	13.02%	0.08%	0.04%	0.63%	3.39%
081	59,007	-504	-0.85%	46,259	78.4%	44.28%	18.64%	24.58%	8.14%	0.14%	0.02%	0.55%	3.65%
082	59,724	213	0.36%	50,238	84.12%	61.86%	14.34%	7.52%	11.03%	0.11%	0.03%	0.65%	4.46%
083	59,416	-95	-0.16%	46,581	78.4%	44.13%	12.06%	33.75%	6.29%	0.1%	0.02%	0.61%	3.03%
084	59,862	351	0.59%	47,350	79.1%	21.11%	69.74%	3.4%	1.4%	0.16%	0.03%	0.59%	3.58%
085	59,373	-138	-0.23%	46,308	78%	17.08%	60.18%	5.99%	12.29%	0.25%	0.02%	0.68%	3.5%
086	59,205	-306	-0.51%	44,614	75.36%	10.6%	71.76%	4.64%	9.02%	0.15%	0.02%	0.67%	3.14%
087	59,709	198	0.33%	45,615	76.4%	11.48%	70.08%	7.73%	6.46%	0.21%	0.02%	0.7%	3.33%
088	59,689	178	0.30%	46,073	77.19%	15.98%	60.71%	11.46%	7.49%	0.23%	0.06%	0.68%	3.39%
089	59,866	355	0.60%	46,198	77.17%	30.38%	59.77%	3.8%	1.78%	0.15%	0.03%	0.48%	3.6%
090	59,812	301	0.51%	48,015	80.28%	32.08%	57.15%	4.65%	1.58%	0.12%	0.03%	0.62%	3.76%
091	60,050	539	0.91%	46,173	76.89%	19.7%	67.92%	7%	1.39%	0.17%	0.04%	0.54%	3.25%
092	60,273	762	1.28%	46,551	77.23%	20.98%	67.63%	5.49%	1.58%	0.16%	0.04%	0.74%	3.39%
093	60,118	607	1.02%	44,734	74.41%	19.94%	63.27%	11.24%	1.34%	0.16%	0.1%	0.69%	3.26%
094	59,211	-300	-0.50%	44,809	75.68%	16.38%	65.88%	8.72%	4.85%	0.19%	0.02%	0.58%	3.37%
095	60,030	519	0.87%	44,948	74.88%	18.79%	64.99%	9.32%	2.29%	0.19%	0.05%	0.73%	3.63%
096	59,515	4	0.01%	44,671	75.06%	17.47%	20.71%	40.49%	17.64%	0.15%	0.06%	0.72%	2.76%
097	59,072	-439	-0.74%	46,339	78.44%	33.19%	25.12%	21.86%	15%	0.19%	0.05%	0.68%	3.92%
098	59,998	487	0.82%	42,734	71.23%	9.69%	19.56%	57.42%	10.69%	0.13%	0.05%	0.6%	1.86%
099	59,850	339	0.57%	45,004	75.19%	39.77%	13.49%	9.52%	32.49%	0.15%	0.04%	0.56%	3.98%
100	60,030	519	0.87%	42,669	71.08%	55.88%	9.01%	10.85%	19.49%	0.18%	0.05%	0.53%	4.01%
101	59,938	427	0.72%	46,584	77.72%	37.36%	22.37%	20.17%	15.23%	0.16%	0.05%	0.7%	3.96%
102	58,959	-552	-0.93%	42,968	72.88%	26.79%	36.41%	23.45%	8.97%	0.22%	0.03%	0.69%	3.44%
103	60,197	686	1.15%	44,399	73.76%	49.51%	15.16%	19.06%	11.68%	0.13%	0.04%	0.61%	3.81%
104	59,362	-149	-0.25%	43,306	72.95%	60.44%	15.61%	12.64%	6.32%	0.16%	0.04%	0.6%	4.2%
105	59,344	-167	-0.28%	43,474	73.26%	38.89%	27.8%	18.1%	10.56%	0.1%	0.03%	0.65%	3.88%
106	59,112	-399	-0.67%	43,890	74.25%	36.66%	35.66%	12.66%	9.78%	0.17%	0.03%	0.81%	4.23%
107	59,702	191	0.32%	44,509	74.55%	19.03%	27.46%	34.49%	15.45%	0.16%	0.03%	0.64%	2.73%
108	59,577	66	0.11%	44,308	74.37%	38.96%	17.34%	20.98%	18.06%	0.17%	0.03%	0.67%	3.78%
109	59,630	119	0.20%	44,140	74.02%	13.5%	29.44%	39.32%	14.39%	0.14%	0.05%	0.63%	2.54%
110	59,951	440	0.74%	43,226	72.1%	32.7%	45.9%	11.87%	4.49%	0.18%	0.04%	0.84%	3.97%
111	60,009	498	0.84%	44,096	73.48%	60.53%	21.74%	10.37%	2.5%	0.18%	0.04%	0.73%	3.91%
112	59,349	-162	-0.27%	45,120	76.02%	71.55%	18.88%	4%	1.27%	0.2%	0.04%	0.47%	3.59%
113	60,053	542	0.91%	44,538	74.16%	28.82%	57.75%	7.78%	0.79%	0.14%	0.12%	0.62%	3.98%
114	59,867	356	0.60%	45,872	76.62%	66.9%	23.89%	4.53%	0.7%	0.18%	0.03%	0.45%	3.33%
115	60,174	663	1.11%	44,807	74.46%	33.12%	51.3%	7.88%	2.67%	0.17%	0.04%	0.81%	4%
116	59,913	402	0.68%	45,791	76.43%	23.87%	56.71%	8.14%	6.39%	0.18%	0.08%	0.83%	3.81%
117	60,130	619	1.04%	44,973	74.79%	51.61%	35.88%	6.28%	1.53%	0.17%	0.04%	0.59%	3.9%

## Population Summary

House-prop1-2021

District	Population	Deviation	% Devn.	[18+_Pop]	[% 18+_Pop]	[% NH_Wht]	[% NH_Blkl]	[% Hispanic Origin]	[% NH_Asn]	[% NH_Ind]	[% NH_Hwn]	[% NH_Oth]	[% NH_2+ Races]
118	59,987	476	0.80%	46,342	77.25%	68.26%	22.55%	4.5%	0.43%	0.18%	0.02%	0.47%	3.59%
119	58,947	-564	-0.95%	44,005	74.65%	66.88%	12.47%	12.17%	3.83%	0.16%	0.02%	0.58%	3.89%
120	58,982	-529	-0.89%	46,767	79.29%	69.85%	13.48%	8.42%	4.05%	0.15%	0.05%	0.5%	3.49%
121	59,127	-384	-0.65%	46,598	78.81%	75.06%	8.66%	6.27%	5.64%	0.11%	0%	0.53%	3.73%
122	59,632	121	0.20%	48,840	81.9%	49.13%	30.63%	13.78%	2.13%	0.28%	0.06%	0.86%	3.13%
123	59,282	-229	-0.38%	46,572	78.56%	65.88%	23.82%	5.33%	1.14%	0.17%	0.02%	0.26%	3.39%
124	59,221	-290	-0.49%	47,638	80.44%	61.53%	26.06%	7.57%	1.14%	0.19%	0.02%	0.37%	3.12%
125	60,137	626	1.05%	43,812	72.85%	60%	21.67%	8.93%	2.4%	0.29%	0.19%	0.52%	5.99%
126	59,260	-251	-0.42%	45,497	76.78%	37.81%	53.88%	3.63%	0.76%	0.27%	0.15%	0.37%	3.13%
127	58,678	-833	-1.40%	45,889	78.2%	65.92%	17.12%	5.58%	5.63%	0.18%	0.18%	0.51%	4.88%
128	58,864	-647	-1.09%	46,488	78.98%	44.14%	51%	1.91%	0.36%	0.19%	0.03%	0.17%	2.22%
129	58,829	-682	-1.15%	46,873	79.68%	33.83%	54.95%	4.74%	2.1%	0.21%	0.14%	0.43%	3.6%
130	59,203	-308	-0.52%	44,019	74.35%	30.19%	60.27%	4.33%	0.79%	0.24%	0.16%	0.42%	3.6%
131	58,890	-621	-1.04%	42,968	72.96%	65.57%	15.99%	7.07%	4.92%	0.19%	0.14%	0.61%	5.51%
132	59,142	-369	-0.62%	46,752	79.05%	33.1%	51.88%	7.91%	2.38%	0.26%	0.19%	0.37%	3.91%
133	59,202	-309	-0.52%	47,222	79.76%	56.35%	37.05%	2.42%	1.12%	0.15%	0.04%	0.38%	2.48%
134	59,396	-115	-0.19%	45,110	75.95%	56.72%	34.18%	4.39%	0.74%	0.22%	0.02%	0.35%	3.37%
135	60,063	552	0.93%	46,725	77.79%	70.69%	22.83%	2.21%	0.51%	0.16%	0.01%	0.33%	3.25%
136	59,298	-213	-0.36%	45,367	76.51%	62.16%	20%	4.4%	1.54%	0.24%	0.03%	0.42%	3.21%
137	59,551	40	0.07%	45,358	76.17%	38.1%	51.27%	5.17%	1.66%	0.12%	0.14%	0.37%	3.17%
138	58,912	-599	-1.01%	45,684	77.55%	70.29%	18.77%	4.1%	2.39%	0.25%	0.06%	0.36%	3.77%
139	59,010	-501	-0.84%	45,522	77.14%	63.55%	19.18%	7.24%	4.03%	0.25%	0.21%	0.59%	4.96%
140	59,294	-217	-0.36%	44,411	74.9%	28.76%	55.8%	9.04%	1.02%	0.27%	0.24%	0.53%	4.34%
141	59,019	-492	-0.83%	44,677	75.7%	29.41%	54.88%	7.93%	2.53%	0.24%	0.3%	0.45%	4.25%
142	59,608	97	0.16%	44,584	74.8%	30.78%	60.48%	4.23%	1.29%	0.16%	0.01%	0.36%	2.68%
143	59,469	-42	-0.07%	46,390	78.01%	29.08%	61.66%	4.87%	0.97%	0.19%	0.05%	0.36%	2.82%
144	59,232	-279	-0.47%	46,370	78.29%	60.82%	29.32%	2.91%	3.46%	0.14%	0.02%	0.36%	2.97%
145	59,863	352	0.59%	45,844	76.58%	51.64%	35.66%	7.02%	0.9%	0.28%	0.04%	0.41%	4.05%
146	60,203	692	1.16%	44,589	74.06%	59.32%	26.73%	5.66%	2.67%	0.17%	0.09%	0.45%	4.91%
147	59,178	-333	-0.56%	44,902	75.88%	51.94%	29.55%	8.3%	4.76%	0.23%	0.07%	0.51%	4.64%
148	59,984	473	0.79%	46,614	77.71%	58.49%	33.89%	3.66%	0.9%	0.12%	0.04%	0.28%	2.63%
149	58,893	-618	-1.04%	46,821	79.5%	60.01%	31.14%	5.61%	0.57%	0.17%	0.03%	0.2%	2.28%
150	59,276	-235	-0.39%	47,050	79.37%	36.16%	53.23%	7.23%	1.17%	0.17%	0.03%	0.17%	1.85%
151	60,059	548	0.92%	46,973	78.21%	45.21%	42.21%	7.51%	1.29%	0.18%	0.23%	0.25%	3.12%
152	60,134	623	1.05%	46,026	76.54%	66.12%	25.86%	2.84%	1.6%	0.21%	0.03%	0.3%	3.03%
153	59,299	-212	-0.36%	45,692	77.05%	24.38%	69.08%	2.93%	0.89%	0.13%	0.02%	0.24%	2.33%
154	59,994	483	0.81%	47,273	78.8%	39.54%	55.53%	2.1%	0.38%	0.16%	0.01%	0.2%	2.09%
155	58,759	-752	-1.26%	45,208	76.94%	57.32%	36.14%	2.62%	0.91%	0.18%	0.05%	0.26%	2.52%
156	59,444	-67	-0.11%	45,867	77.16%	58.49%	29.79%	8.27%	0.6%	0.17%	0.01%	0.25%	2.42%
157	59,957	446	0.75%	45,311	75.57%	61.81%	23.59%	11.19%	0.54%	0.16%	0.04%	0.21%	2.47%
158	59,440	-71	-0.12%	45,549	76.63%	59.27%	31.5%	5.6%	0.75%	0.18%	0.03%	0.25%	2.42%
159	59,895	384	0.65%	44,871	74.92%	67.46%	23.88%	3.65%	0.54%	0.28%	0.03%	0.34%	3.82%
160	59,935	424	0.71%	48,057	80.18%	66.84%	21.68%	5.5%	1.62%	0.24%	0.1%	0.28%	3.76%
161	60,097	586	0.98%	44,371	73.83%	57.53%	25.83%	7.89%	3.03%	0.24%	0.09%	0.5%	4.9%

## Population Summary

House-prop1-2021

District	Population	Deviation	% Devn.	[18+ _Pop]	[% 18+ _Pop]	[% NH_Wht]	[% NH_Blkl]	[% Hispanic Origin]	[% NH_Asn]	[% NH_Ind]	[% NH_Hwn]	[% NH_Oth]	[% NH_2+ Races]
162	60,308	797	1.34%	46,733	77.49%	36.7%	43.34%	10.78%	4%	0.2%	0.24%	0.54%	4.19%
163	60,123	612	1.03%	48,461	80.6%	38.48%	46.14%	8.45%	3.12%	0.19%	0.13%	0.39%	3.1%
164	60,101	590	0.99%	45,851	76.29%	57.7%	22.03%	9.95%	4.21%	0.24%	0.12%	0.68%	5.08%
165	59,978	467	0.78%	48,247	80.44%	35.1%	52.41%	5.53%	3.19%	0.22%	0.14%	0.38%	3.02%
166	60,242	731	1.23%	47,580	78.98%	82.79%	4.94%	5.19%	2.65%	0.16%	0.05%	0.4%	3.82%
167	59,493	-18	-0.03%	44,140	74.19%	62.89%	20.99%	8.81%	1.42%	0.35%	0.23%	0.5%	4.79%
168	60,147	636	1.07%	44,867	74.6%	36.24%	43.3%	11.22%	1.98%	0.31%	0.67%	0.48%	5.79%
169	59,138	-373	-0.63%	45,267	76.54%	58.36%	28.84%	9.03%	0.79%	0.15%	0.02%	0.2%	2.6%
170	60,116	605	1.02%	45,316	75.38%	60.65%	24.39%	10.43%	1.19%	0.13%	0.02%	0.28%	2.91%
171	59,237	-274	-0.46%	45,969	77.6%	51.23%	39.79%	5.73%	0.54%	0.21%	0.03%	0.21%	2.26%
172	59,961	450	0.76%	44,756	74.64%	57.24%	23.26%	16%	0.77%	0.21%	0.03%	0.23%	2.27%
173	59,743	232	0.39%	45,292	75.81%	52.67%	36.22%	6.95%	0.79%	0.33%	0.02%	0.3%	2.72%
174	59,852	341	0.57%	45,760	76.46%	70.83%	16.91%	7.88%	0.47%	0.35%	0.04%	0.22%	3.3%
175	59,993	482	0.81%	44,704	74.52%	64.08%	23.75%	6.1%	1.78%	0.26%	0.07%	0.34%	3.64%
176	59,470	-41	-0.07%	44,991	75.65%	63.56%	21.74%	9.95%	0.91%	0.24%	0.08%	0.29%	3.23%
177	59,992	481	0.81%	46,014	76.7%	33.22%	54.7%	6.69%	1.26%	0.21%	0.07%	0.42%	3.42%
178	59,877	366	0.62%	45,638	76.22%	75.62%	14.4%	6.22%	0.52%	0.18%	0.01%	0.29%	2.76%
179	59,356	-155	-0.26%	47,156	79.45%	59.03%	28.39%	7.73%	1.06%	0.17%	0.13%	0.39%	3.11%
180	59,412	-99	-0.17%	45,362	76.35%	68.71%	16.96%	6.47%	1.56%	0.32%	0.11%	0.57%	5.3%

**Total: 10,711,908****Ideal District: 59,511**

User: H097

Plan Name: House-prop1-2021

Plan Type: House

## Population Summary

### Summary Statistics:

Population Range:	58,678 to 60,308
Ratio Range:	0.03
Absolute Range:	-833 to 797
Absolute Overall Range:	1,630
Relative Range:	-1.40% to 1.34%
Relative Overall Range:	2.74%
Absolute Mean Deviation:	363.71
Relative Mean Deviation:	0.61%
Standard Deviation:	417.67

District	Population	Deviation	% Devn.	[18+_Pop]	[% 18+_Pop]	[% NH18+_Wht]	[% NH18+_Blk]	[% H18+_Pop]	[% NH18+_Asn]	[% NH18+_Ind]	[% NH18+_Hwn]	[% NH18+_Oth]	[% NH18+_2+ Races]
001	59,666	155	0.26%	46,801	78.44%	89.43%	3.65%	2.11%	0.57%	0.32%	0.05%	0.21%	3.65%
002	59,773	262	0.44%	46,159	77.22%	85.33%	2.64%	7.57%	1.07%	0.2%	0.02%	0.2%	2.97%
003	60,199	688	1.16%	46,716	77.6%	88.46%	2.71%	2.96%	1.56%	0.28%	0.14%	0.14%	3.77%
004	59,070	-441	-0.74%	42,798	72.45%	47.78%	4.53%	44.13%	1.28%	0.19%	0.02%	0.21%	1.86%
005	58,837	-674	-1.13%	44,623	75.84%	78.55%	3.81%	12.62%	1.26%	0.22%	0.03%	0.19%	3.31%
006	59,712	201	0.34%	45,152	75.62%	83%	1%	11.96%	0.51%	0.25%	0.02%	0.17%	3.09%
007	59,081	-430	-0.72%	48,771	82.55%	90.15%	0.34%	5.53%	0.46%	0.27%	0.01%	0.21%	3.02%
008	59,244	-267	-0.45%	49,612	83.74%	91.87%	1.12%	2.74%	0.54%	0.3%	0%	0.29%	3.13%
009	59,474	-37	-0.06%	48,273	81.17%	88.93%	1.06%	4.74%	0.83%	0.41%	0.06%	0.33%	3.64%
010	59,519	8	0.01%	47,164	79.24%	81.82%	3.19%	10.04%	1.58%	0.18%	0.03%	0.21%	2.95%
011	58,792	-719	-1.21%	45,396	77.21%	89.31%	1.43%	4.23%	1.06%	0.23%	0.03%	0.27%	3.44%
012	59,300	-211	-0.35%	46,487	78.39%	80.42%	8.94%	6.15%	1.01%	0.18%	0%	0.33%	2.97%
013	59,150	-361	-0.61%	45,176	76.38%	66.3%	18.03%	10.84%	1.36%	0.22%	0.02%	0.26%	2.97%
014	59,135	-376	-0.63%	45,511	76.96%	83.02%	6.06%	5.88%	0.8%	0.25%	0.02%	0.31%	3.65%
015	59,213	-298	-0.50%	45,791	77.33%	71.9%	13.11%	9.67%	1.36%	0.27%	0.03%	0.36%	3.3%
016	59,402	-109	-0.18%	44,009	74.09%	76.42%	10.83%	8.61%	0.79%	0.21%	0.05%	0.32%	2.76%
017	59,120	-391	-0.66%	42,761	72.33%	66.02%	21.24%	6.94%	1.41%	0.25%	0.06%	0.54%	3.55%
018	59,335	-176	-0.30%	45,159	76.11%	86.01%	7.17%	2.39%	0.62%	0.26%	0.04%	0.26%	3.24%
019	58,955	-556	-0.93%	44,299	75.14%	65.37%	22.26%	6.8%	1.21%	0.21%	0.07%	0.48%	3.59%
020	60,107	596	1.00%	45,725	76.07%	76.4%	7.96%	9.18%	2.03%	0.14%	0.04%	0.55%	3.7%
021	59,529	18	0.03%	44,931	75.48%	82.07%	4.23%	7.44%	1.87%	0.22%	0.05%	0.61%	3.51%
022	59,460	-51	-0.09%	45,815	77.05%	65.61%	13.32%	11.57%	4.04%	0.21%	0.03%	0.76%	4.47%
023	59,048	-463	-0.78%	44,254	74.95%	75.29%	5.48%	14.23%	1.12%	0.21%	0.05%	0.32%	3.3%
024	59,011	-500	-0.84%	41,814	70.86%	63.42%	6.04%	10.32%	16.41%	0.17%	0.05%	0.56%	3.03%
025	59,414	-97	-0.16%	42,520	71.57%	56.12%	5.08%	5.09%	30.56%	0.1%	0.03%	0.45%	2.56%
026	59,248	-263	-0.44%	44,081	74.4%	68.21%	3.18%	10.76%	14.26%	0.12%	0.04%	0.44%	2.99%
027	58,795	-716	-1.20%	46,004	78.24%	82.61%	3.07%	9.6%	0.83%	0.2%	0.04%	0.24%	3.4%
028	58,972	-539	-0.91%	44,444	75.36%	79.36%	3.15%	11.44%	2.16%	0.17%	0.03%	0.36%	3.33%

## Population Summary

House-prop1-2021

District	Population	Deviation	% Devn.	[18+_Pop]	[% 18+_Pop]	[% NH18+_Wht]	[% NH18+_Blk]	[% H18+_Pop]	[% NH18+_Asn]	[% NH18+_Ind]	[% NH18+_Hwn ]	[% NH18+_Oth]	[% NH18+_ 2+ Races]
029	59,200	-311	-0.52%	43,131	72.86%	42.29%	12.55%	39.71%	3.02%	0.14%	0.06%	0.33%	1.91%
030	59,266	-245	-0.41%	45,414	76.63%	70.5%	7.19%	16.13%	2.96%	0.15%	0.02%	0.28%	2.77%
031	59,901	390	0.66%	43,120	71.99%	68.65%	6.79%	18.95%	2.35%	0.21%	0.03%	0.32%	2.69%
032	59,145	-366	-0.62%	45,942	77.68%	82.98%	7.21%	4.87%	1.25%	0.32%	0.05%	0.2%	3.12%
033	59,187	-324	-0.54%	46,498	78.56%	82.25%	10.57%	3.13%	1.16%	0.15%	0.01%	0.29%	2.43%
034	59,875	364	0.61%	45,758	76.42%	69.23%	14.11%	7.85%	4.43%	0.12%	0.03%	0.65%	3.58%
035	59,889	378	0.64%	48,312	80.67%	53.63%	25.59%	11.15%	4.58%	0.19%	0.05%	0.77%	4.04%
036	59,994	483	0.81%	44,911	74.86%	70.77%	15.48%	6.51%	3.02%	0.15%	0.04%	0.6%	3.44%
037	59,176	-335	-0.56%	46,223	78.11%	46.26%	25.84%	18.64%	4.61%	0.21%	0.02%	0.91%	3.52%
038	59,317	-194	-0.33%	44,839	75.59%	30.1%	51.13%	12.62%	1.87%	0.24%	0.05%	0.63%	3.36%
039	59,381	-130	-0.22%	44,436	74.83%	23.47%	52.5%	18.66%	1.77%	0.17%	0.03%	0.6%	2.79%
040	59,044	-467	-0.78%	47,976	81.25%	51.14%	30.35%	5.92%	8.24%	0.15%	0.01%	0.63%	3.55%
041	60,122	611	1.03%	45,271	75.3%	27.62%	36.96%	28.55%	3.13%	0.22%	0.05%	0.84%	2.62%
042	59,620	109	0.18%	48,525	81.39%	39%	30.85%	17.38%	7.45%	0.2%	0.04%	1.14%	3.94%
043	59,464	-47	-0.08%	47,033	79.09%	46.31%	24.03%	14.15%	7.62%	0.21%	0.09%	2.27%	5.32%
044	60,002	491	0.83%	46,773	77.95%	67.69%	10.5%	10.53%	5.78%	0.2%	0.02%	1.06%	4.23%
045	59,738	227	0.38%	44,023	73.69%	74.94%	4.27%	4.85%	12.05%	0.05%	0.02%	0.59%	3.23%
046	59,108	-403	-0.68%	44,132	74.66%	74.81%	6.73%	7.38%	6.72%	0.13%	0.04%	0.61%	3.53%
047	59,126	-385	-0.65%	43,932	74.3%	63.89%	9.3%	7.37%	15.16%	0.17%	0.03%	0.62%	3.46%
048	59,003	-508	-0.85%	44,779	75.89%	61.77%	10.14%	12.41%	11.59%	0.08%	0.04%	0.56%	3.42%
049	59,153	-358	-0.60%	45,263	76.52%	71.48%	7.22%	10.74%	10.74%	0.1%	0.03%	0.63%	3.12%
050	59,523	12	0.02%	43,940	73.82%	44.37%	10.8%	6.36%	34.63%	0.07%	0.05%	0.58%	3.13%
051	58,952	-559	-0.94%	47,262	80.17%	54.33%	21.3%	13.31%	5.93%	0.18%	0.05%	1.01%	3.89%
052	59,811	300	0.50%	48,525	81.13%	55.14%	14.19%	7.41%	19.12%	0.14%	0.07%	0.68%	3.24%
053	59,953	442	0.74%	46,944	78.3%	71.2%	12.71%	7.44%	4.58%	0.09%	0.02%	0.54%	3.41%
054	60,083	572	0.96%	50,338	83.78%	62.98%	13.67%	12.79%	6.86%	0.13%	0.03%	0.53%	3.02%
055	59,971	460	0.77%	49,255	82.13%	35.51%	52.85%	4.97%	3.19%	0.18%	0.04%	0.37%	2.88%
056	58,929	-582	-0.98%	52,757	89.53%	36.98%	42.9%	5.84%	9.92%	0.2%	0.08%	0.41%	3.67%
057	59,969	458	0.77%	52,097	86.87%	63.64%	16.18%	7.95%	7.99%	0.1%	0.02%	0.6%	3.52%
058	59,057	-454	-0.76%	50,514	85.53%	27.56%	60.36%	5.07%	3.04%	0.12%	0.04%	0.51%	3.3%
059	59,434	-77	-0.13%	49,179	82.75%	22.04%	66.72%	4.43%	2.9%	0.17%	0.02%	0.54%	3.18%
060	59,709	198	0.33%	45,490	76.19%	28.09%	61.3%	5.11%	2.17%	0.18%	0.05%	0.43%	2.67%
061	59,302	-209	-0.35%	45,447	76.64%	16.75%	71.33%	7.61%	0.97%	0.17%	0.05%	0.51%	2.6%
062	59,450	-61	-0.10%	46,426	78.09%	19.07%	69.19%	6.83%	1.3%	0.21%	0.05%	0.47%	2.88%
063	59,381	-130	-0.22%	45,043	75.85%	19.22%	66.7%	9.26%	1.54%	0.21%	0.04%	0.47%	2.56%
064	58,986	-525	-0.88%	44,189	74.91%	57.83%	28.63%	7.44%	1.41%	0.3%	0.04%	0.7%	3.67%
065	59,464	-47	-0.08%	44,386	74.64%	31.46%	59.19%	4.53%	1.15%	0.19%	0.05%	0.51%	2.92%
066	59,047	-464	-0.78%	44,278	74.99%	33.93%	50.39%	9.49%	1.86%	0.26%	0.08%	0.63%	3.36%
067	59,135	-376	-0.63%	44,299	74.91%	30.86%	56.59%	7.75%	1.39%	0.19%	0.03%	0.49%	2.7%
068	59,477	-34	-0.06%	44,835	75.38%	33.94%	53.42%	6.33%	2.77%	0.14%	0.05%	0.63%	2.72%
069	58,682	-829	-1.39%	45,548	77.62%	26.89%	60.9%	5.42%	3.12%	0.18%	0.04%	0.78%	2.68%
070	59,121	-390	-0.66%	45,249	76.54%	59.69%	26.23%	7.96%	2.23%	0.22%	0.06%	0.4%	3.22%
071	59,538	27	0.05%	44,582	74.88%	69.8%	18.45%	6.18%	1.01%	0.24%	0.02%	0.42%	3.88%



## Population Summary

House-prop1-2021

District	Population	Deviation	% Devn.	[18+_Pop]	[% 18+_Pop]	[% NH18+_Wht]	[% NH18+_Blk]	[% H18+_Pop]	[% NH18+_Asn]	[% NH18+_Ind]	[% NH18+_Hwn]	[% NH18+_Oth]	[% NH18+_2+ Races]
072	59,660	149	0.25%	46,229	77.49%	69.24%	19.51%	6.94%	0.93%	0.19%	0.02%	0.23%	2.94%
073	60,036	525	0.88%	45,736	76.18%	72.58%	10.84%	7.05%	5.58%	0.14%	0.03%	0.4%	3.38%
074	58,956	-555	-0.93%	44,696	75.81%	64.44%	24%	5.55%	2.04%	0.21%	0.02%	0.47%	3.26%
075	59,743	232	0.39%	43,850	73.4%	11.27%	71.04%	11.28%	2.93%	0.18%	0.07%	0.66%	2.57%
076	59,759	248	0.42%	44,371	74.25%	10.51%	64.4%	13.23%	8.69%	0.21%	0.05%	0.51%	2.41%
077	59,242	-269	-0.45%	44,207	74.62%	7.58%	73.27%	12.2%	4.36%	0.23%	0.06%	0.41%	1.9%
078	59,044	-467	-0.78%	44,572	75.49%	15.05%	68.35%	8.89%	4.21%	0.2%	0.03%	0.63%	2.63%
079	59,500	-11	-0.02%	43,223	72.64%	7.15%	68.44%	16.03%	5.51%	0.2%	0.01%	0.56%	2.09%
080	59,461	-50	-0.08%	44,784	75.32%	47.63%	12.45%	23.12%	13.33%	0.07%	0.04%	0.56%	2.79%
081	59,007	-504	-0.85%	46,259	78.4%	47.01%	19.77%	20.92%	8.71%	0.14%	0.01%	0.46%	2.98%
082	59,724	213	0.36%	50,238	84.12%	62.46%	15.19%	6.79%	11.35%	0.11%	0.04%	0.56%	3.51%
083	59,416	-95	-0.16%	46,581	78.4%	47.9%	13.51%	28.47%	6.91%	0.1%	0.02%	0.55%	2.55%
084	59,862	351	0.59%	47,350	79.1%	21.29%	70.47%	2.9%	1.48%	0.16%	0.02%	0.55%	3.07%
085	59,373	-138	-0.23%	46,308	78%	19.48%	59.85%	5.32%	10.8%	0.21%	0.02%	0.57%	3.14%
086	59,205	-306	-0.51%	44,614	75.36%	12.08%	72.02%	4.29%	7.95%	0.15%	0.01%	0.65%	2.84%
087	59,709	198	0.33%	45,615	76.4%	13.5%	69.72%	6.69%	6.22%	0.24%	0.02%	0.64%	2.97%
088	59,689	178	0.30%	46,073	77.19%	18.3%	60.15%	9.97%	7.64%	0.22%	0.07%	0.64%	3.01%
089	59,866	355	0.60%	46,198	77.17%	31.07%	60.06%	3.42%	1.92%	0.15%	0.03%	0.41%	2.93%
090	59,812	301	0.51%	48,015	80.28%	33.98%	56.05%	4.26%	1.82%	0.12%	0.03%	0.53%	3.2%
091	60,050	539	0.91%	46,173	76.89%	22%	67.15%	5.86%	1.44%	0.15%	0.05%	0.49%	2.86%
092	60,273	762	1.28%	46,551	77.23%	24.05%	65.71%	4.68%	1.67%	0.17%	0.03%	0.61%	3.08%
093	60,118	607	1.02%	44,734	74.41%	22.91%	62.36%	9.58%	1.48%	0.17%	0.09%	0.61%	2.81%
094	59,211	-300	-0.50%	44,809	75.68%	18.42%	65.61%	7.29%	4.85%	0.19%	0.02%	0.54%	3.07%
095	60,030	519	0.87%	44,948	74.88%	21.83%	63.61%	7.94%	2.43%	0.22%	0.04%	0.67%	3.27%
096	59,515	4	0.01%	44,671	75.06%	20.32%	20.75%	36.03%	19.7%	0.11%	0.04%	0.6%	2.44%
097	59,072	-439	-0.74%	46,339	78.44%	36.44%	24.16%	19.23%	16.07%	0.19%	0.05%	0.6%	3.25%
098	59,998	487	0.82%	42,734	71.23%	11.66%	20.91%	52.77%	12.28%	0.12%	0.05%	0.51%	1.71%
099	59,850	339	0.57%	45,004	75.19%	42.1%	13.07%	8.67%	32.63%	0.13%	0.04%	0.48%	2.89%
100	60,030	519	0.87%	42,669	71.08%	59.05%	8.86%	9.98%	18.41%	0.19%	0.06%	0.43%	3.02%
101	59,938	427	0.72%	46,584	77.72%	40.14%	21.87%	18.24%	15.98%	0.16%	0.05%	0.54%	3.02%
102	58,959	-552	-0.93%	42,968	72.88%	30.65%	34.79%	21.34%	9.57%	0.2%	0.03%	0.52%	2.89%
103	60,197	686	1.15%	44,399	73.76%	52.42%	15.01%	16.89%	12.19%	0.12%	0.03%	0.5%	2.83%
104	59,362	-149	-0.25%	43,306	72.95%	62.96%	15.44%	11.14%	6.38%	0.18%	0.05%	0.51%	3.34%
105	59,344	-167	-0.28%	43,474	73.26%	41.74%	26.67%	16.76%	11.05%	0.1%	0.03%	0.54%	3.12%
106	59,112	-399	-0.67%	43,890	74.25%	41.22%	33.7%	11.14%	9.73%	0.16%	0.03%	0.74%	3.28%
107	59,702	191	0.32%	44,509	74.55%	21.96%	27.02%	31.09%	16.75%	0.18%	0.04%	0.56%	2.4%
108	59,577	66	0.11%	44,308	74.37%	43.36%	16.55%	18.16%	18.34%	0.18%	0.04%	0.53%	2.84%
109	59,630	119	0.20%	44,140	74.02%	15.44%	29.65%	36.12%	15.82%	0.12%	0.06%	0.55%	2.25%
110	59,951	440	0.74%	43,226	72.1%	36.58%	44.02%	10.49%	4.72%	0.18%	0.04%	0.72%	3.25%
111	60,009	498	0.84%	44,096	73.48%	64%	20.56%	8.84%	2.56%	0.2%	0.04%	0.64%	3.17%
112	59,349	-162	-0.27%	45,120	76.02%	73.73%	18.26%	3.28%	1.26%	0.22%	0.02%	0.41%	2.81%
113	60,053	542	0.91%	44,538	74.16%	31.8%	56.48%	6.65%	0.83%	0.15%	0.11%	0.59%	3.39%
114	59,867	356	0.60%	45,872	76.62%	68.84%	23.42%	3.73%	0.71%	0.18%	0.01%	0.35%	2.76%

## Population Summary

House-prop1-2021

District	Population	Deviation	% Devn.	[18+_Pop]	[% 18+_Pop]	[% NH18+_Wht]	[% NH18+_Blk]	[% H18+_Pop]	[% NH18+_Asn]	[% NH18+_Ind]	[% NH18+_Hwn ]	[% NH18+_Oth]	[% NH18+_ 2+ Races]
115	60,174	663	1.11%	44,807	74.46%	36.95%	49.2%	6.97%	2.68%	0.2%	0.05%	0.69%	3.26%
116	59,913	402	0.68%	45,791	76.43%	27.22%	54.93%	7.29%	6.48%	0.19%	0.09%	0.74%	3.05%
117	60,130	619	1.04%	44,973	74.79%	54.5%	34.54%	5.44%	1.54%	0.19%	0.04%	0.52%	3.22%
118	59,987	476	0.80%	46,342	77.25%	69.73%	22.7%	3.68%	0.42%	0.2%	0.02%	0.39%	2.85%
119	58,947	-564	-0.95%	44,005	74.65%	69.8%	12.31%	10.44%	3.75%	0.17%	0.02%	0.43%	3.08%
120	58,982	-529	-0.89%	46,767	79.29%	71.94%	13.21%	7.09%	4.18%	0.16%	0.05%	0.44%	2.91%
121	59,127	-384	-0.65%	46,598	78.81%	76.13%	8.6%	5.57%	5.84%	0.1%	0%	0.46%	3.3%
122	59,632	121	0.20%	48,840	81.9%	54.8%	27.13%	11.7%	2.41%	0.32%	0.06%	0.79%	2.79%
123	59,282	-229	-0.38%	46,572	78.56%	68.06%	23.42%	4.31%	1.06%	0.19%	0.02%	0.2%	2.75%
124	59,221	-290	-0.49%	47,638	80.44%	65.01%	24.61%	6.17%	1.08%	0.19%	0.02%	0.31%	2.61%
125	60,137	626	1.05%	43,812	72.85%	63.03%	21.43%	7.66%	2.6%	0.31%	0.16%	0.39%	4.41%
126	59,260	-251	-0.42%	45,497	76.78%	39.97%	52.63%	3.17%	0.89%	0.29%	0.16%	0.29%	2.62%
127	58,678	-833	-1.40%	45,889	78.2%	68.13%	16.88%	4.77%	5.68%	0.19%	0.16%	0.43%	3.77%
128	58,864	-647	-1.09%	46,488	78.98%	46.49%	49.38%	1.7%	0.35%	0.19%	0.01%	0.17%	1.71%
129	58,829	-682	-1.15%	46,873	79.68%	37.16%	52.33%	4.26%	2.4%	0.19%	0.15%	0.41%	3.1%
130	59,203	-308	-0.52%	44,019	74.35%	33.74%	57.69%	3.86%	0.97%	0.26%	0.19%	0.34%	2.95%
131	58,890	-621	-1.04%	42,968	72.96%	68.16%	15.87%	5.87%	5.21%	0.21%	0.1%	0.55%	4.03%
132	59,142	-369	-0.62%	46,752	79.05%	35.63%	49.52%	7.8%	2.74%	0.27%	0.16%	0.3%	3.28%
133	59,202	-309	-0.52%	47,222	79.76%	58.39%	35.87%	2.15%	1.15%	0.15%	0.04%	0.36%	1.89%
134	59,396	-115	-0.19%	45,110	75.95%	59.9%	32.37%	3.74%	0.81%	0.23%	0.02%	0.25%	2.69%
135	60,063	552	0.93%	46,725	77.79%	71.78%	22.84%	1.82%	0.55%	0.16%	0.01%	0.25%	2.57%
136	59,298	-213	-0.36%	45,367	76.51%	63.9%	27.76%	3.64%	1.55%	0.26%	0.04%	0.29%	2.55%
137	59,551	40	0.07%	45,358	76.17%	40.52%	50.02%	4.48%	1.73%	0.12%	0.12%	0.26%	2.44%
138	58,912	-599	-1.01%	45,684	77.55%	72.34%	18.26%	3.31%	2.43%	0.26%	0.07%	0.35%	2.97%
139	59,010	-501	-0.84%	45,522	77.14%	66.19%	18.56%	6.36%	3.89%	0.25%	0.24%	0.46%	4.04%
140	59,294	-217	-0.36%	44,411	74.9%	31.7%	54.74%	8.02%	1.17%	0.24%	0.2%	0.49%	3.43%
141	59,019	-492	-0.83%	44,677	75.7%	31.77%	54.65%	6.55%	2.69%	0.27%	0.3%	0.38%	3.38%
142	59,608	97	0.16%	44,584	74.8%	34.8%	57.42%	3.7%	1.4%	0.17%	0.02%	0.28%	2.2%
143	59,469	-42	-0.07%	46,390	78.01%	32.28%	58.98%	4.67%	1.07%	0.21%	0.05%	0.3%	2.44%
144	59,232	-279	-0.47%	46,370	78.29%	62.95%	28.34%	2.55%	3.45%	0.14%	0.02%	0.26%	2.29%
145	59,863	352	0.59%	45,844	76.58%	55.12%	33.97%	5.94%	0.99%	0.33%	0.03%	0.3%	3.32%
146	60,203	692	1.16%	44,589	74.06%	61.84%	26.08%	4.73%	2.98%	0.18%	0.09%	0.39%	3.71%
147	59,178	-333	-0.56%	44,902	75.88%	55.32%	28.41%	7.17%	4.85%	0.25%	0.07%	0.41%	3.52%
148	59,984	473	0.79%	46,614	77.71%	60.45%	33.11%	3.08%	0.87%	0.14%	0.04%	0.21%	2.1%
149	58,893	-618	-1.04%	46,821	79.5%	60.99%	30.75%	5.69%	0.57%	0.19%	0.04%	0.14%	1.63%
150	59,276	-235	-0.39%	47,050	79.37%	38.31%	52.5%	6.13%	1.18%	0.16%	0.03%	0.15%	1.54%
151	60,059	548	0.92%	46,973	78.21%	47.2%	40.96%	7.28%	1.43%	0.18%	0.18%	0.19%	2.58%
152	60,134	623	1.05%	46,026	76.54%	67.94%	25.26%	2.34%	1.52%	0.24%	0.04%	0.19%	2.46%
153	59,299	-212	-0.36%	45,692	77.05%	27.66%	66.38%	2.55%	1%	0.16%	0.03%	0.23%	2.01%
154	59,994	483	0.81%	47,273	78.8%	42.24%	53.68%	1.67%	0.36%	0.19%	0%	0.16%	1.7%
155	58,759	-752	-1.26%	45,208	76.94%	59.77%	34.6%	2.22%	0.95%	0.16%	0.04%	0.21%	2.05%
156	59,444	-67	-0.11%	45,867	77.16%	60.92%	29.32%	6.88%	0.62%	0.16%	0.01%	0.15%	1.93%
157	59,957	446	0.75%	45,311	75.57%	64.48%	23.7%	8.96%	0.57%	0.17%	0.04%	0.16%	1.93%

## Population Summary

House-prop1-2021

District	Population	Deviation	% Devn.	[18+_Pop]	[% 18+_Pop]	[% NH18+_Wht]	[% NH18+_Blk]	[% H18+_Pop]	[% NH18+_Asn]	[% NH18+_Ind]	[% NH18+_Hwn ]	[% NH18+_Oth]	[% NH18+_2+ Races]
158	59,440	-71	-0.12%	45,549	76.63%	62.21%	30.2%	4.52%	0.71%	0.21%	0.03%	0.18%	1.93%
159	59,895	384	0.65%	44,871	74.92%	69.39%	23.44%	2.87%	0.57%	0.31%	0.04%	0.26%	3.12%
160	59,935	424	0.71%	48,057	80.18%	68.48%	21.07%	5.04%	1.64%	0.24%	0.09%	0.27%	3.17%
161	60,097	586	0.98%	44,371	73.83%	60.16%	25.26%	6.82%	3.16%	0.25%	0.09%	0.48%	3.77%
162	60,308	797	1.34%	46,733	77.49%	40.62%	41.13%	9.58%	4.16%	0.22%	0.24%	0.44%	3.61%
163	60,123	612	1.03%	48,461	80.6%	41.92%	43.78%	7.38%	3.6%	0.2%	0.1%	0.33%	2.68%
164	60,101	590	0.99%	45,851	76.29%	60.61%	21.43%	8.49%	4.37%	0.26%	0.12%	0.6%	4.12%
165	59,978	467	0.78%	48,247	80.44%	39.18%	48.49%	5.33%	3.68%	0.25%	0.14%	0.35%	2.57%
166	60,242	731	1.23%	47,580	78.98%	84.71%	4.96%	4.07%	2.69%	0.18%	0.05%	0.36%	2.97%
167	59,493	-18	-0.03%	44,140	74.19%	65.96%	20.55%	7.41%	1.48%	0.39%	0.18%	0.39%	3.66%
168	60,147	636	1.07%	44,867	74.6%	39.29%	42.28%	10.3%	2.32%	0.33%	0.65%	0.38%	4.46%
169	59,138	-373	-0.63%	45,267	76.54%	60.95%	28.12%	7.66%	0.88%	0.14%	0.03%	0.16%	2.06%
170	60,116	605	1.02%	45,316	75.38%	64.17%	23.21%	8.65%	1.19%	0.12%	0.02%	0.25%	2.38%
171	59,237	-274	-0.46%	45,969	77.6%	53.85%	38.58%	4.63%	0.56%	0.24%	0.02%	0.17%	1.95%
172	59,961	450	0.76%	44,756	74.64%	61.03%	22.46%	13.42%	0.78%	0.23%	0.03%	0.19%	1.87%
173	59,743	232	0.39%	45,292	75.81%	55.68%	35.18%	5.35%	0.84%	0.37%	0.02%	0.26%	2.31%
174	59,852	341	0.57%	45,760	76.46%	72.25%	16.08%	7.96%	0.52%	0.38%	0.03%	0.15%	2.64%
175	59,993	482	0.81%	44,704	74.52%	66.49%	23.13%	5.03%	1.85%	0.28%	0.06%	0.3%	2.86%
176	59,470	-41	-0.07%	44,991	75.65%	66.15%	21.61%	8.24%	0.96%	0.25%	0.1%	0.19%	2.49%
177	59,992	481	0.81%	46,014	76.7%	37.12%	51.68%	6.12%	1.36%	0.24%	0.08%	0.36%	3.04%
178	59,877	366	0.62%	45,638	76.22%	77.79%	13.99%	5.14%	0.54%	0.2%	0.01%	0.23%	2.09%
179	59,356	-155	-0.26%	47,156	79.45%	63.69%	25.74%	6.38%	1.07%	0.15%	0.11%	0.34%	2.51%
180	59,412	-99	-0.17%	45,362	76.35%	71.17%	16.63%	5.62%	1.67%	0.31%	0.11%	0.47%	4.02%

Total: 10,711,908

Ideal District: 59,511

# EXHIBIT Y-2

RETRIEVED FROM DEMOCRACYDOCKET.COM

## Population Summary Report

## Georgia State House --2021 Plan

District	2020 Pop.	% 2020 Deviation	18+ Pop	18+ AP Black	% 18+ AP Black	18+ NH White	% 18+ NH White	2015-19 BCVAP*	2015-19 LCVAP*	2015-19 ACVAP*	2015-19 B+L+A CVAP*	2015-19 NH White CVAP*	Incumbent
001	59666	0.26%	46801	1966	4.20%	41,853	89.43%	4.14%	1.48%	0.59%	6.21%	92.43%	1
002	59773	0.44%	46159	1456	3.15%	39,386	85.33%	3.86%	4.16%	0.80%	8.82%	90.50%	1
003	60199	1.16%	46716	1565	3.35%	41,325	88.46%	3.08%	1.83%	1.37%	6.29%	92.55%	1
004	59070	-0.74%	42798	2303	5.38%	20,448	47.78%	5.71%	25.44%	1.01%	32.16%	67.15%	1
005	58837	-1.13%	44623	2051	4.60%	35,053	78.55%	4.46%	6.67%	0.96%	12.09%	86.91%	1
006	59712	0.34%	45152	682	1.51%	37,476	83.00%	1.29%	6.31%	0.43%	8.02%	91.05%	1
007	59081	-0.72%	48771	302	0.62%	43,969	90.15%	0.68%	2.17%	0.41%	3.25%	95.14%	1
008	59244	-0.45%	49612	708	1.43%	45,581	91.87%	1.44%	2.23%	0.49%	4.16%	94.71%	1
009	59474	-0.06%	48273	759	1.57%	42,931	88.93%	1.71%	2.66%	0.57%	4.93%	94.28%	1
010	59519	0.01%	47164	1757	3.73%	38,589	81.82%	3.83%	4.94%	1.50%	10.26%	88.73%	1
011	58792	-1.21%	45396	839	1.85%	40,541	89.31%	1.63%	2.59%	0.93%	5.16%	90.22%	1
012	59300	-0.35%	46487	4498	9.68%	37,386	80.42%	10.04%	2.53%	0.63%	13.20%	86.12%	1
013	59150	-0.61%	45176	8665	19.18%	29,952	66.30%	19.91%	4.99%	1.05%	25.95%	73.41%	1
014	59135	-0.63%	45511	3117	6.85%	37,785	83.02%	6.71%	3.93%	0.64%	11.27%	87.16%	1
015	59213	-0.50%	45791	6500	14.19%	32,924	71.90%	14.42%	3.71%	0.85%	18.98%	80.35%	1
016	59402	-0.18%	44009	5146	11.69%	33,631	76.42%	11.62%	4.30%	0.54%	16.46%	82.94%	0
017	59120	-0.66%	42761	9843	23.02%	28,229	66.02%	17.72%	5.14%	1.23%	24.09%	75.21%	1
018	59335	-0.30%	45159	3604	7.98%	38,843	86.01%	8.95%	1.69%	1.01%	11.64%	87.90%	1
019	58955	-0.93%	44299	10697	24.15%	28,958	65.37%	19.56%	4.56%	0.77%	24.89%	73.74%	2
020	60107	1.00%	45725	4230	9.25%	34,934	76.40%	9.27%	6.75%	1.34%	17.36%	82.13%	1
021	59529	0.03%	44931	2272	5.06%	36,876	82.07%	4.55%	3.05%	0.90%	8.50%	90.83%	2
022	59460	-0.09%	45815	6918	15.10%	30,057	65.61%	15.67%	5.63%	3.54%	24.83%	74.48%	1
023	59048	-0.78%	44254	2878	6.50%	33,318	75.29%	4.34%	5.64%	1.57%	11.55%	87.70%	1
024	59011	-0.84%	41814	2926	7.00%	26,519	63.42%	5.86%	6.07%	7.24%	19.16%	80.21%	1
025	59414	-0.16%	42520	2507	5.90%	23,862	56.12%	5.22%	4.81%	16.23%	26.27%	72.84%	1
026	59248	-0.44%	44081	1767	4.01%	30,066	68.21%	4.77%	5.87%	6.08%	16.72%	82.25%	0
027	58795	-1.20%	46004	1698	3.69%	38,005	82.61%	3.97%	5.71%	1.07%	10.75%	88.84%	1
028	58972	-0.91%	44444	1747	3.93%	35,271	79.36%	1.50%	6.06%	0.83%	8.39%	91.29%	0
029	59200	-0.52%	43131	5861	13.59%	18,235	42.29%	17.77%	20.24%	2.39%	40.40%	58.08%	1
030	59266	-0.41%	45414	3678	8.10%	32,015	70.50%	8.75%	8.04%	2.49%	19.28%	79.71%	0
031	59901	0.66%	43120	3265	7.57%	23,604	68.65%	7.86%	10.98%	2.25%	21.09%	78.18%	2
032	59145	-0.62%	45942	3659	7.96%	38,122	82.98%	8.83%	2.60%	1.00%	12.42%	86.61%	1
033	59187	-0.54%	46498	5207	11.20%	38,246	82.25%	12.55%	2.06%	0.79%	15.40%	83.88%	1
034	59875	0.61%	45758	7169	15.67%	31,678	69.23%	15.26%	4.72%	5.32%	25.30%	73.92%	1
035	59889	0.64%	48312	13722	28.40%	25,909	53.63%	25.77%	6.43%	3.58%	35.78%	63.34%	0
036	59994	0.81%	44911	7626	16.98%	31,783	70.77%	17.15%	4.59%	1.29%	23.03%	76.18%	1
037	59176	-0.56%	46223	13027	28.18%	21,382	46.26%	30.58%	7.43%	3.16%	41.18%	58.34%	1
038	59317	-0.33%	44839	24318	54.23%	13,498	30.10%	52.38%	7.49%	2.86%	62.74%	36.70%	1
039	59381	-0.22%	44436	24569	55.29%	10,429	23.47%	59.23%	8.52%	1.79%	69.53%	30.26%	1
040	59044	-0.78%	47976	15821	32.98%	24,534	51.14%	29.86%	4.41%	5.61%	39.87%	58.91%	1
041	60122	1.03%	45271	17816	39.35%	12,502	27.62%	47.64%	13.36%	2.67%	63.67%	35.34%	1
042	59620	0.18%	48525	16353	33.70%	18,923	39.00%	39.76%	10.29%	4.95%	55.00%	44.51%	1
043	59464	-0.08%	47033	12476	26.53%	21,781	46.31%	26.95%	6.99%	5.20%	39.14%	59.11%	0
044	60002	0.83%	46773	5635	12.05%	31,659	67.69%	12.81%	6.60%	4.84%	24.26%	74.86%	1
045	59738	0.38%	44023	2324	5.28%	32,991	74.94%	3.60%	3.51%	7.54%	14.65%	84.92%	2
046	59108	-0.68%	44132	3560	8.07%	33,016	74.81%	6.55%	6.01%	4.69%	17.25%	81.81%	1
047	59126	-0.65%	43932	4709	10.72%	28,066	63.89%	12.84%	5.83%	6.02%	24.69%	74.63%	1
048	59003	-0.85%	44779	5279	11.79%	27,658	61.77%	12.23%	6.00%	9.73%	27.96%	71.19%	1
049	59153	-0.60%	45263	3813	8.42%	32,354	71.48%	10.87%	4.00%	7.65%	22.52%	76.74%	1
050	59523	0.02%	43940	5450	12.40%	19,496	44.37%	11.55%	5.31%	23.59%	40.45%	58.72%	1
051	58952	-0.94%	47262	11193	23.68%	25,679	54.33%	24.58%	5.56%	4.40%	34.54%	64.37%	1
052	59811	0.50%	48525	7758	15.99%	26,755	55.14%	15.76%	5.67%	7.50%	28.92%	70.09%	1
053	59953	0.74%	46944	6819	14.53%	33,426	71.20%	12.79%	4.21%	2.92%	19.93%	80.34%	0
054	60083	0.96%	50338	7789	15.47%	31,705	62.98%	15.88%	4.44%	5.83%	26.15%	72.68%	2
055	59971	0.77%	49255	27279	55.38%	17,490	35.51%	60.00%	2.60%	1.97%	64.58%	34.69%	1
056	58929	-0.98%	52757	23993	45.48%	19,509	36.98%	52.88%	4.08%	6.40%	63.37%	35.97%	1
057	59969	0.77%	52097	9411	18.06%	33,156	63.64%	14.16%	4.13%	5.35%	23.64%	75.60%	1
058	59057	-0.76%	50514	31845	63.04%	13,923	27.56%	66.09%	2.73%	3.48%	72.29%	26.79%	1
059	59434	-0.13%	49179	34470	70.09%	10,840	22.04%	71.92%	2.92%	1.89%	76.73%	22.50%	0
060	59709	0.33%	45490	29061	63.88%	12,778	28.09%	68.47%	2.24%	0.98%	71.69%	28.16%	1
061	59302	-0.35%	45447	33762	74.29%	7,613	16.75%	75.83%	4.05%	1.14%	81.02%	18.54%	1
062	59450	-0.10%	46426	33548	72.26%	8,852	19.07%	75.18%	2.79%	1.08%	79.06%	20.37%	2
063	59381	-0.22%	45043	31229	69.33%	8,658	19.22%	71.54%	4.27%	0.89%	76.70%	22.93%	1
064	58986	-0.88%	44189	13577	30.72%	25,553	57.83%	30.33%	4.46%	0.95%	35.74%	63.15%	0
065	59464	-0.08%	44386	27511	61.98%	13,963	31.46%	59.51%	2.93%	0.44%	62.88%	36.85%	1



## Population Summary Report

## Georgia State House --2021 Plan

District	2020 Pop.	% 2020 Deviation	18+ Pop	18+ AP Black	% 18+ AP Black	18+ NH White	% 18+ NH White	2015-19 BCVAP*	2015-19 LCVAP*	2015-19 ACVAP*	2015-19 B+L+A CVAP*	2015-19 NH White CVAP*	Incumbent
066	59047	-0.78%	44278	23647	53.41%	15,022	33.93%	47.12%	3.83%	1.54%	52.48%	45.78%	1
067	59135	-0.63%	44299	26099	58.92%	13,670	30.86%	54.23%	5.01%	0.55%	59.80%	39.83%	1
068	59477	-0.06%	44835	24994	55.75%	15,216	33.94%	50.16%	3.57%	2.07%	55.81%	42.43%	1
069	58682	-1.39%	45548	28950	63.56%	12,249	26.89%	62.65%	3.35%	3.31%	69.31%	31.18%	1
070	59121	-0.66%	45249	12591	27.83%	27,007	59.69%	28.55%	6.23%	1.51%	36.29%	62.66%	0
071	59538	0.05%	44582	8879	19.92%	31,118	69.80%	19.13%	3.43%	0.84%	23.39%	75.54%	1
072	59660	0.25%	46229	9642	20.86%	32,007	69.24%	21.50%	2.94%	1.12%	25.56%	73.92%	1
073	60036	0.88%	45736	5538	12.11%	33,193	72.58%	10.78%	5.03%	2.59%	18.40%	80.53%	1
074	58956	-0.93%	44696	11406	25.52%	28,804	64.44%	23.50%	3.73%	1.59%	28.81%	70.80%	1
075	59743	0.39%	43850	32623	74.40%	4,941	11.27%	74.57%	6.56%	2.86%	83.99%	14.55%	1
076	59759	0.42%	44371	29832	67.23%	4,665	10.51%	72.76%	6.06%	7.23%	86.04%	12.73%	1
077	59242	-0.45%	44207	33655	76.13%	3,349	7.58%	80.76%	4.77%	3.46%	89.00%	9.59%	1
078	59044	-0.78%	44572	31904	71.58%	6,707	15.05%	72.00%	4.57%	4.45%	81.01%	18.36%	1
079	59500	-0.02%	43223	30942	71.59%	3,090	7.15%	78.94%	6.19%	4.17%	89.31%	10.02%	1
080	59461	-0.08%	44784	6350	14.18%	21,330	47.63%	16.17%	8.06%	10.04%	34.27%	64.59%	1
081	59007	-0.85%	46259	10099	21.83%	21,746	47.01%	24.74%	6.39%	8.31%	39.44%	59.72%	1
082	59724	0.36%	50238	8455	16.83%	31,380	62.46%	14.52%	4.04%	8.59%	27.15%	71.96%	1
083	59416	-0.16%	46581	7044	15.12%	22,311	47.90%	16.97%	6.61%	6.17%	29.75%	69.47%	0
084	59862	0.59%	47350	34877	73.66%	10,081	21.29%	77.66%	1.91%	0.99%	80.56%	19.08%	1
085	59373	-0.23%	46308	29041	62.71%	9,022	19.48%	74.05%	2.08%	3.65%	79.77%	19.17%	1
086	59205	-0.51%	44614	33485	75.05%	5,391	12.08%	78.52%	1.57%	3.23%	83.32%	16.17%	1
087	59709	0.33%	45615	33336	73.08%	6,159	13.50%	78.29%	2.42%	3.61%	84.32%	14.95%	2
088	59689	0.30%	46073	29187	63.35%	8,432	18.30%	65.89%	4.51%	4.12%	74.51%	24.96%	0
089	59866	0.60%	46198	28890	62.54%	14,355	31.07%	65.13%	2.01%	1.78%	68.92%	30.40%	1
090	59812	0.51%	48015	28082	58.49%	16,315	33.98%	62.05%	2.54%	1.42%	66.01%	33.20%	1
091	60050	0.91%	46173	32341	70.04%	10,158	22.00%	65.45%	3.80%	1.27%	70.52%	29.11%	0
092	60273	1.28%	46551	32022	68.79%	11,196	24.05%	64.65%	2.56%	1.89%	69.11%	30.09%	1
093	60118	1.02%	44734	29239	65.36%	10,247	22.31%	63.92%	5.46%	1.57%	70.95%	27.76%	1
094	59211	-0.50%	44809	30935	69.04%	8,255	18.42%	72.68%	2.54%	2.83%	78.05%	21.57%	1
095	60030	0.87%	44948	30183	67.15%	9,814	21.83%	66.23%	4.53%	1.83%	72.59%	26.93%	1
096	59515	0.01%	44671	10273	23.00%	9,075	20.32%	28.15%	16.85%	18.81%	63.82%	34.84%	1
097	59072	-0.74%	46339	12405	26.77%	16,887	36.44%	32.63%	9.58%	11.62%	53.83%	46.12%	1
098	59998	0.82%	42734	9934	23.25%	4,981	11.66%	35.31%	23.62%	16.87%	75.81%	23.12%	1
099	59850	0.57%	45004	6622	14.71%	18,948	42.10%	16.08%	7.28%	21.18%	44.54%	53.53%	0
100	60030	0.87%	42669	4273	10.01%	25,197	59.05%	9.34%	6.75%	9.65%	25.75%	73.50%	2
101	59938	0.72%	46584	11269	24.19%	18,698	40.14%	24.18%	9.81%	11.44%	45.43%	53.38%	2
102	58959	-0.93%	42968	16164	37.62%	13,169	30.65%	39.02%	11.06%	7.92%	58.00%	40.65%	0
103	60197	1.15%	44399	7454	16.79%	23,273	52.42%	17.59%	8.52%	10.33%	36.44%	63.14%	0
104	59362	-0.25%	43306	7373	17.03%	27,265	62.96%	12.72%	6.22%	5.06%	24.00%	75.44%	1
105	59344	-0.28%	43474	12628	29.05%	18,145	41.74%	28.97%	9.77%	8.06%	46.80%	52.93%	1
106	59112	-0.67%	43890	15918	36.27%	18,090	41.22%	36.87%	7.33%	5.60%	49.81%	49.70%	2
107	59702	0.32%	44509	13186	29.63%	9,775	21.96%	33.83%	17.35%	15.26%	66.44%	33.07%	1
108	59577	0.11%	44308	8132	18.35%	19,214	43.36%	18.94%	7.74%	13.58%	40.25%	58.77%	1
109	59630	0.20%	44140	14352	32.51%	6,816	15.44%	40.70%	17.64%	14.28%	72.62%	26.06%	1
110	59951	0.74%	43226	20400	47.19%	15,812	36.58%	40.53%	5.96%	5.09%	51.58%	46.32%	0
111	60009	0.84%	44096	9828	22.29%	28,221	64.00%	13.78%	5.02%	2.32%	21.12%	77.64%	1
112	59349	-0.27%	45120	8667	19.21%	33,268	73.73%	21.18%	2.03%	0.90%	24.11%	75.78%	1
113	60053	0.91%	44538	26515	59.53%	14,162	31.80%	57.33%	3.97%	1.08%	62.37%	37.09%	1
114	59867	0.60%	45872	11347	24.74%	31,580	68.84%	23.12%	1.76%	0.39%	25.26%	73.99%	1
115	60174	1.11%	44807	23357	52.13%	16,555	36.95%	48.14%	3.92%	2.17%	54.22%	45.02%	1
116	59913	0.68%	45791	26616	58.12%	12,464	27.22%	51.32%	5.67%	6.15%	63.14%	34.65%	1
117	60130	1.04%	44973	16463	36.61%	24,511	54.50%	28.45%	4.25%	0.69%	33.38%	66.00%	0
118	59987	0.80%	46342	10937	23.60%	32,314	69.73%	24.74%	2.11%	0.31%	27.15%	72.66%	2
119	58947	-0.95%	44005	5935	13.49%	30,715	69.80%	12.74%	6.35%	2.74%	21.83%	77.41%	1
120	58982	-0.89%	46767	6679	14.28%	33,645	71.94%	14.96%	4.19%	2.56%	21.71%	77.24%	1
121	59127	-0.65%	46598	4454	9.56%	35,475	76.13%	11.42%	2.84%	2.58%	16.84%	82.73%	1
122	59632	0.20%	48840	13878	28.42%	26,762	54.80%	34.51%	5.17%	3.54%	43.22%	55.91%	1
123	59282	-0.38%	46572	11307	24.28%	31,695	68.06%	27.70%	2.03%	0.34%	30.07%	69.98%	1
124	59221	-0.49%	47638	12186	25.58%	30,971	65.01%	28.39%	2.55%	1.07%	32.01%	67.67%	1
125	60137	1.05%	43812	10376	23.68%	27,614	63.03%	22.39%	6.34%	1.81%	30.55%	67.91%	1
126	59260	-0.42%	45497	24782	54.47%	18,185	39.97%	55.51%	2.98%	1.54%	60.03%	38.98%	1
127	58678	-1.40%	45889	8500	18.52%	31,263	68.13%	18.57%	3.13%	4.19%	25.89%	73.35%	1
128	58864	-1.09%	46488	23434	50.41%	21,612	46.49%	52.01%	1.33%	0.32%	53.67%	45.65%	0
129	58829	-1.15%	46873	25717	54.87%	17,419	37.16%	55.43%	2.75%	1.69%	59.86%	39.79%	1
130	59203	-0.52%	44019	26372	59.91%	14,854	33.74%	58.72%	3.21%	0.53%	62.46%	36.63%	1
131	58890	-1.04%	42968	7572	17.62%	29,286	68.16%	12.47%	5.00%	4.69%	22.16%	76.39%	1
132	59142	-0.62%	46752	24471	52.34%	16,658	35.63%	55.59%	4.97%	1.66%	62.21%	37.18%	2

## Population Summary Report

## Georgia State House --2021 Plan

District	2020 Pop.	% 2020 Deviation	18+ Pop	18+ AP Black	% 18+ AP Black	18+ NH White	% 18+ NH White	2015-19 BCVAP*	2015-19 LCVAP*	2015-19 ACVAP*	2015-19 B+L+A CVAP*	2015-19 NH White CVAP*	Incumbent
133	59202	-0.52%	47222	17358	36.76%	27,574	58.39%	35.45%	1.59%	1.08%	38.12%	61.38%	2
134	59396	-0.19%	45110	15143	33.57%	27,023	59.90%	33.55%	2.45%	0.98%	36.98%	62.33%	1
135	60063	0.93%	46725	11098	23.75%	33,540	71.78%	23.98%	0.87%	0.53%	25.37%	73.48%	1
136	59298	-0.36%	45367	13005	28.67%	28,990	63.90%	31.62%	1.79%	0.56%	33.97%	65.40%	1
137	59551	0.07%	45358	23647	52.13%	18,517	40.82%	51.97%	2.74%	1.04%	55.75%	43.10%	1
138	58912	-1.01%	45684	8824	19.32%	33,050	72.34%	19.43%	3.05%	2.17%	24.64%	74.35%	1
139	59010	-0.84%	45522	9227	20.27%	30,132	66.19%	19.73%	5.74%	2.78%	28.26%	70.52%	1
140	59294	-0.36%	44411	25596	57.63%	14,080	31.70%	60.08%	5.42%	1.42%	66.92%	31.79%	1
141	59019	-0.83%	44677	25672	57.46%	14,194	31.77%	54.64%	6.69%	1.90%	63.23%	36.14%	1
142	59608	0.16%	44584	26536	59.52%	15,516	34.80%	60.39%	1.74%	1.38%	63.50%	35.85%	1
143	59469	-0.07%	46390	28201	60.79%	14,977	32.28%	59.11%	1.76%	1.04%	61.90%	37.23%	1
144	59232	-0.47%	46370	13598	29.32%	29,191	62.95%	28.95%	2.15%	2.01%	33.11%	66.01%	1
145	59863	0.59%	45844	16353	35.67%	25,270	55.12%	35.67%	2.79%	0.98%	39.45%	59.81%	1
146	60203	1.16%	44589	12312	27.61%	27,576	61.84%	24.84%	4.45%	2.70%	31.99%	66.86%	1
147	59178	-0.56%	44902	13526	30.12%	24,842	55.32%	29.85%	4.35%	3.25%	37.46%	61.48%	1
148	59984	0.79%	46614	15858	34.02%	28,176	60.45%	35.88%	1.82%	0.24%	37.94%	61.36%	1
149	58893	-1.04%	46821	15051	32.15%	28,556	60.99%	35.17%	1.23%	0.33%	36.73%	62.58%	1
150	59276	-0.39%	47050	25202	53.56%	18,026	38.31%	54.81%	3.09%	0.52%	58.42%	41.17%	1
151	60059	0.92%	46973	19920	42.41%	22,169	47.20%	44.02%	4.81%	1.10%	49.93%	49.36%	1
152	60134	1.05%	46026	11993	26.06%	31,272	67.94%	25.78%	1.91%	1.55%	29.24%	69.38%	1
153	59299	-0.36%	45692	31047	67.95%	12,637	27.66%	68.49%	1.28%	0.97%	70.75%	28.90%	1
154	59994	0.81%	47273	25914	54.82%	19,967	42.24%	55.63%	1.02%	0.26%	56.91%	42.57%	2
155	58759	-1.26%	45208	16208	35.85%	27,019	59.77%	35.45%	2.00%	0.73%	38.17%	61.47%	1
156	59444	-0.11%	45867	13875	30.25%	27,940	60.92%	31.96%	3.23%	0.43%	35.62%	64.26%	1
157	59957	0.75%	45311	11176	24.67%	29,216	64.48%	26.96%	5.61%	0.39%	32.95%	66.63%	1
158	59440	-0.12%	45549	14209	31.19%	28,334	62.21%	31.91%	1.82%	0.28%	34.01%	65.14%	1
159	59895	0.65%	44871	10995	24.50%	31,137	69.39%	26.66%	2.28%	0.57%	29.51%	69.76%	1
160	59935	0.71%	48057	10859	22.60%	32,909	68.48%	22.98%	2.09%	0.91%	25.98%	73.38%	1
161	60097	0.98%	44371	12042	27.14%	26,692	60.16%	23.81%	3.78%	1.73%	29.32%	69.93%	1
162	60308	1.34%	46733	20435	43.73%	18,984	40.62%	44.67%	7.32%	3.03%	55.02%	43.50%	0
163	60123	1.03%	48461	22045	45.49%	20,317	41.92%	51.94%	3.60%	1.32%	56.86%	42.83%	2
164	60101	0.99%	45851	10760	23.47%	27,792	60.61%	22.01%	5.21%	2.70%	29.92%	69.22%	1
165	59978	0.78%	48247	24282	50.33%	18,901	39.18%	62.33%	2.53%	0.78%	65.65%	33.16%	0
166	60242	1.23%	47580	2698	5.67%	40,307	84.71%	5.22%	2.82%	2.50%	10.54%	88.84%	1
167	59493	-0.03%	44140	9835	22.28%	29,113	65.96%	26.07%	4.71%	0.87%	31.65%	67.17%	1
168	60147	1.07%	44867	20757	46.26%	17,627	39.29%	44.48%	10.46%	2.01%	56.95%	41.06%	1
169	59138	-0.63%	45267	13147	29.04%	27,591	60.95%	31.68%	4.18%	0.67%	36.53%	63.22%	1
170	60116	1.02%	45316	10976	24.22%	29,080	64.17%	24.69%	4.11%	0.92%	29.72%	69.87%	1
171	59237	-0.46%	45969	18202	39.60%	24,755	53.85%	40.49%	1.98%	0.64%	43.11%	56.20%	1
172	59961	0.76%	44756	10439	23.32%	27,315	61.03%	26.03%	6.29%	0.57%	32.88%	66.31%	1
173	59743	0.39%	45292	16428	36.27%	25,217	55.68%	37.77%	1.67%	0.42%	39.86%	59.10%	1
174	59852	0.57%	45760	7950	17.37%	33,060	72.25%	17.49%	3.43%	0.74%	21.65%	77.52%	1
175	59993	0.81%	44704	10805	24.17%	29,725	66.49%	22.04%	4.63%	2.38%	29.05%	69.96%	1
176	59470	-0.07%	44991	10206	22.68%	29,763	66.15%	23.14%	4.76%	0.40%	28.30%	70.47%	2
177	59992	0.81%	46014	24793	53.88%	17,082	37.12%	52.30%	3.20%	0.84%	56.35%	43.19%	1
178	59877	0.62%	45638	6750	14.79%	35,503	77.79%	15.45%	3.24%	0.47%	19.16%	80.35%	1
179	59356	-0.26%	47156	12745	27.03%	30,035	63.69%	27.71%	2.66%	1.61%	31.99%	67.22%	1
180	59412	-0.17%	45362	8261	18.21%	32,283	71.17%	19.01%	4.79%	1.62%	25.42%	73.45%	1

Total  
2020

Pop. 10,711,908

Majority Districts

2.74%

8,220,274

2,607,986

31.73%

4,342,333

52.82%

49

101

49

62

116

# EXHIBIT Z-1

RETRIEVED FROM DEMOCRACYDOCKET.COM







# EXHIBIT Z-2

RETRIEVED FROM DEMOCRACYDOCKET.COM



## Population Summary Report

## Georgia State House --Illustrative Plan

District	2020 Pop.	% 2020 Deviation	18+ Pop	18+ AP Black	% 18+ AP Black	18+ NH White	% 18+ NH White	2015-19 BCVAP*	2015-19 LCVAP*	2015-19 ACVAP*	2015-19 B+L+A CVAP*	2015-19 NH White CVAP*	Incumbent
001	59437	-0.12%	46702	1872	4.01%	41,873	89.66%	4.33%	1.50%	0.61%	6.45%	92.41%	1
002	59950	0.74%	46103	1428	3.10%	40,396	87.62%	2.74%	2.99%	0.27%	6.00%	92.98%	1
003	60199	1.16%	46716	1565	3.35%	41,325	88.46%	3.08%	1.83%	1.37%	6.29%	92.55%	1
004	59715	0.34%	43446	2164	4.98%	22,742	52.35%	5.09%	21.46%	0.44%	26.99%	71.87%	1
005	58992	-0.87%	44689	1958	4.38%	35,181	78.72%	4.45%	6.37%	0.91%	11.73%	87.30%	1
006	59171	-0.57%	44514	1035	2.33%	33,732	75.78%	2.80%	10.16%	1.46%	14.42%	85.09%	1
007	60117	1.02%	49292	311	0.63%	44,360	89.99%	0.73%	2.28%	0.42%	3.42%	95.10%	1
008	59365	-0.25%	50050	490	0.98%	45,859	91.63%	1.39%	2.31%	0.50%	4.19%	94.80%	1
009	60286	1.30%	49130	756	1.54%	43,602	88.75%	1.84%	2.75%	0.59%	5.18%	93.81%	1
010	59086	-0.71%	46638	1808	3.88%	40,194	86.18%	3.48%	3.24%	0.91%	7.63%	91.53%	1
011	59778	0.45%	47979	1360	2.83%	42,340	88.25%	3.04%	3.08%	0.84%	6.96%	88.11%	1
012	58876	-1.07%	45889	5769	12.57%	34,666	75.54%	11.82%	3.31%	1.08%	16.21%	83.56%	1
013	60053	0.91%	46362	7606	16.41%	33,202	71.61%	17.47%	4.55%	0.74%	22.76%	76.05%	1
014	59310	-0.34%	45251	4826	10.66%	35,828	79.18%	9.36%	3.76%	0.72%	13.84%	85.66%	0
015	59492	-0.03%	45648	6111	13.39%	33,501	73.39%	14.77%	3.16%	0.76%	18.69%	80.20%	2
016	59196	-0.53%	44735	3329	7.44%	36,751	82.15%	9.11%	3.75%	0.60%	13.46%	86.00%	1
017	58802	-1.19%	41822	6656	15.92%	30,587	73.14%	10.44%	5.47%	0.73%	16.65%	82.41%	1
018	59116	-0.66%	45784	10515	22.97%	29,816	65.12%	22.76%	3.69%	0.48%	26.93%	72.01%	0
019	58641	-1.46%	43696	8349	19.11%	31,338	71.72%	16.47%	3.59%	1.89%	21.96%	77.76%	1
020	59666	0.26%	46479	4701	10.11%	34,117	73.40%	9.65%	6.04%	1.65%	17.34%	82.03%	1
021	60270	1.28%	45210	3516	7.78%	34,132	75.50%	7.79%	7.73%	1.62%	17.14%	82.12%	1
022	58963	-0.92%	42831	3209	7.49%	31,979	74.66%	9.61%	4.06%	5.26%	18.94%	80.58%	1
023	60197	1.15%	44638	3920	8.78%	31,316	70.16%	7.90%	5.42%	2.22%	15.55%	83.72%	1
024	60138	1.05%	43694	1620	3.71%	35,819	81.98%	1.63%	5.03%	1.24%	7.90%	91.75%	0
025	59131	-0.64%	41640	2743	6.59%	23,150	55.60%	6.20%	6.12%	12.97%	25.29%	73.84%	1
026	58847	-1.12%	41465	2232	5.38%	27,265	65.75%	5.60%	5.36%	7.39%	18.35%	80.50%	1
027	59826	0.53%	47540	2283	4.80%	36,129	76.00%	5.30%	9.82%	1.33%	16.45%	82.93%	1
028	59060	-0.76%	45656	2844	6.23%	36,993	81.03%	6.68%	4.21%	1.72%	12.61%	86.28%	1
029	58965	-0.92%	41483	5977	14.41%	14,350	34.59%	18.67%	25.16%	2.04%	45.87%	52.90%	2
030	59376	-0.23%	45730	3011	6.58%	32,739	71.59%	6.68%	8.49%	2.62%	17.79%	81.70%	0
031	59858	0.58%	44200	3370	7.62%	34,961	79.10%	8.49%	4.40%	2.03%	14.92%	84.43%	1
032	59541	0.05%	46808	5534	11.82%	38,219	81.65%	12.82%	2.01%	0.74%	15.56%	83.86%	1
033	59586	0.13%	46648	8571	18.37%	34,478	73.91%	20.26%	1.96%	0.32%	22.53%	77.09%	1
034	58806	-1.18%	45799	9739	21.26%	30,332	66.23%	20.53%	4.97%	3.04%	28.54%	70.60%	1
035	59432	-0.13%	45932	11287	24.57%	26,008	56.62%	25.41%	6.60%	4.00%	36.02%	62.89%	1
036	58748	-1.28%	44526	5425	12.18%	32,692	73.42%	10.31%	4.38%	3.85%	18.54%	81.04%	1
037	58759	-1.26%	45657	14366	31.47%	19,998	43.80%	34.50%	8.50%	4.09%	47.08%	52.67%	1
038	58628	-1.48%	44687	23014	51.50%	13,792	30.86%	51.77%	8.20%	2.80%	62.77%	36.62%	1
039	59217	-0.49%	45078	23090	51.22%	13,130	29.13%	52.36%	7.78%	2.22%	62.37%	37.74%	1
040	59087	-0.71%	43696	28674	65.62%	9,474	21.68%	69.36%	4.78%	2.00%	76.14%	23.14%	1
041	58750	-1.28%	43855	15527	35.41%	16,029	36.55%	40.39%	10.35%	4.56%	55.30%	44.07%	1
042	59492	-0.03%	49167	15717	31.97%	17,925	36.46%	39.05%	9.24%	4.95%	53.25%	45.30%	1
043	58895	-1.04%	45618	8790	19.27%	25,736	56.42%	18.03%	5.58%	6.20%	29.82%	68.89%	1
044	58816	-1.17%	47689	9059	19.00%	29,027	60.87%	17.52%	6.12%	4.65%	28.30%	70.68%	1
045	58712	-1.34%	44858	5725	12.76%	30,946	68.99%	9.64%	4.46%	5.16%	19.26%	80.39%	1
046	60086	0.97%	44683	3543	7.93%	33,464	74.89%	6.60%	4.71%	5.09%	16.39%	82.38%	1
047	59665	0.26%	45057	5818	12.91%	22,802	50.61%	13.73%	7.85%	14.63%	36.22%	62.74%	0
048	59887	0.63%	46318	6569	14.18%	28,517	61.57%	17.42%	6.50%	4.70%	28.63%	70.84%	1
049	58771	-1.24%	44121	5290	11.99%	24,051	54.51%	12.57%	4.67%	16.59%	33.83%	65.18%	1
050	59184	-0.55%	45645	8762	19.20%	13,868	30.38%	17.87%	9.23%	29.04%	56.13%	42.68%	1
051	60227	1.20%	48254	10458	21.67%	28,040	58.11%	21.95%	5.16%	5.69%	32.80%	66.08%	1
052	60265	1.27%	49155	7426	15.11%	28,331	57.64%	15.81%	6.09%	4.86%	26.76%	72.49%	1
053	58830	-1.14%	47187	12966	27.48%	25,634	54.32%	26.27%	6.07%	3.85%	36.19%	63.09%	1
054	59230	-0.47%	51206	8367	16.34%	35,074	68.50%	14.25%	2.82%	5.90%	22.96%	76.25%	1
055	59073	-0.74%	47334	24895	52.59%	17,550	37.08%	57.34%	2.70%	1.81%	61.84%	37.36%	1
056	59420	-0.15%	52804	27857	52.76%	16,832	31.88%	57.59%	4.50%	7.26%	69.35%	29.92%	1
057	59610	0.17%	51582	29227	56.66%	16,826	32.62%	57.86%	3.82%	2.62%	64.31%	35.20%	1
058	59735	0.38%	52851	8978	16.99%	33,455	63.30%	13.97%	4.48%	5.26%	23.70%	75.41%	1
059	58942	-0.96%	47719	26665	55.88%	16,219	33.99%	60.67%	3.30%	1.78%	65.75%	33.68%	1
060	59197	-0.53%	45411	34928	76.92%	5,864	12.91%	80.25%	3.13%	0.89%	84.27%	15.14%	1
061	59666	0.26%	45697	32994	72.20%	8,230	18.01%	75.64%	4.16%	1.06%	80.86%	18.93%	1
062	59384	-0.21%	45565	41225	90.48%	1,744	3.83%	91.85%	1.92%	0.71%	94.48%	4.67%	1
063	58806	-1.18%	45567	30138	66.14%	11,676	25.62%	64.68%	3.15%	2.29%	70.12%	29.90%	1
064	59151	-0.60%	44832	29047	64.79%	11,797	26.31%	58.96%	3.87%	2.99%	65.82%	33.32%	1
065	58920	-0.99%	44304	28677	64.73%	11,644	26.28%	63.12%	3.70%	0.62%	67.44%	32.18%	1

## Georgia State House --Illustrative Plan

District	2020 Pop.	% 2020 Deviation	18+ Pop	18+ AP Black	% 18+ AP Black	18+ NH White	% 18+ NH White	2015-19 BCVAP*	2015-19 LCVAP*	2015-19 ACVAP*	2015-19 B+L+A CVAP*	2015-19 NH White CVAP*	Incumbent
066	60347	1.40%	44791	29544	65.96%	10,787	24.08%	61.44%	3.46%	1.38%	66.28%	32.05%	1
067	59645	0.23%	44739	28087	62.78%	12,904	28.84%	58.04%	3.23%	0.42%	61.69%	37.83%	0
068	58798	-1.20%	43885	10997	25.06%	28,222	64.31%	25.13%	3.57%	0.92%	29.63%	70.05%	1
069	59534	0.04%	45679	5452	11.94%	37,178	81.39%	12.42%	2.13%	1.02%	15.57%	83.22%	1
070	59744	0.39%	45324	13530	29.85%	25,142	55.47%	30.95%	6.78%	2.31%	40.04%	58.82%	0
071	60122	1.03%	45707	4375	9.57%	36,597	80.07%	8.40%	3.79%	1.17%	13.36%	86.17%	1
072	58656	-1.44%	44356	4212	9.50%	33,237	74.93%	8.44%	4.56%	2.57%	15.57%	82.86%	1
073	60364	1.43%	45016	27267	60.57%	13,220	29.37%	58.61%	4.70%	1.74%	65.04%	34.15%	1
074	58666	-1.42%	43337	30556	70.51%	3,867	8.92%	76.95%	5.52%	4.42%	86.89%	11.78%	1
075	58818	-1.16%	43406	29530	68.03%	5,224	12.04%	71.49%	6.85%	5.52%	83.86%	14.70%	1
076	60113	1.01%	45375	32656	71.97%	5,826	12.84%	74.34%	4.77%	4.18%	83.29%	16.42%	1
077	58912	-1.01%	43070	32766	76.08%	2,874	6.67%	81.32%	5.37%	2.96%	89.65%	9.11%	1
078	59048	-0.78%	45065	24825	55.09%	13,085	29.04%	50.85%	5.85%	5.25%	61.96%	37.47%	1
079	58770	-1.25%	44626	6312	14.14%	24,204	54.24%	14.57%	4.76%	8.16%	27.50%	71.54%	1
080	59573	0.10%	45724	7782	17.02%	20,402	44.62%	21.11%	7.22%	7.81%	36.14%	62.81%	1
081	59188	-0.54%	44856	10639	23.72%	11,988	26.73%	30.23%	14.09%	11.59%	55.92%	42.55%	1
082	59452	-0.10%	50594	9193	18.17%	28,598	56.52%	16.02%	5.57%	7.64%	29.24%	70.37%	1
083	58898	-1.03%	44947	25250	56.18%	16,281	36.22%	59.85%	2.58%	1.95%	64.38%	35.16%	1
084	58670	-1.41%	46089	31650	68.67%	11,665	25.31%	74.24%	1.31%	1.32%	76.86%	22.73%	1
085	58922	-0.99%	47601	19783	41.56%	19,894	41.79%	49.97%	2.26%	4.40%	56.62%	41.94%	1
086	59065	-0.75%	43463	24022	55.27%	10,490	24.14%	58.46%	2.44%	5.48%	66.38%	31.99%	1
087	59585	0.12%	45472	25676	56.47%	11,391	25.05%	59.08%	3.37%	6.54%	68.99%	30.64%	1
088	58705	-1.35%	45238	25820	57.08%	9,480	20.96%	62.92%	4.45%	5.72%	73.10%	26.36%	1
089	59915	0.68%	48186	26012	53.98%	18,319	38.02%	56.91%	2.36%	1.93%	61.19%	37.98%	1
090	60372	1.45%	47305	35494	75.03%	9,490	20.06%	73.58%	2.47%	1.01%	77.06%	22.64%	1
091	60390	1.48%	45133	35001	77.55%	6,348	14.07%	76.15%	4.42%	0.96%	81.53%	17.76%	1
092	59982	0.79%	45766	42337	92.51%	1,492	3.26%	93.89%	1.52%	0.39%	95.81%	3.73%	1
093	60260	1.26%	45920	25233	54.95%	16,745	35.47%	51.89%	3.42%	1.43%	56.75%	42.91%	1
094	59284	-0.38%	44177	23246	52.62%	12,161	27.53%	55.47%	4.34%	4.04%	63.84%	35.64%	1
095	58825	-1.15%	46205	8699	18.83%	23,380	50.60%	20.40%	5.70%	12.12%	38.22%	61.19%	1
096	58713	-1.34%	43674	11976	27.42%	8,843	20.26%	37.37%	18.06%	12.17%	67.61%	31.74%	1
097	58771	-1.24%	42969	6202	14.43%	19,803	46.09%	13.97%	6.18%	19.96%	40.12%	60.28%	1
098	58629	-1.48%	42827	5044	11.78%	26,495	61.87%	11.85%	6.60%	5.95%	24.40%	74.73%	1
099	58815	-1.17%	41927	9348	22.30%	5,194	12.39%	32.90%	22.43%	18.07%	73.40%	25.83%	1
100	58895	-1.04%	43773	13867	31.68%	6,434	14.70%	39.39%	19.12%	15.54%	74.05%	24.93%	1
101	60372	1.45%	45390	13488	29.72%	13,800	30.40%	32.47%	12.05%	13.39%	57.92%	41.41%	1
102	59365	-0.25%	46364	10979	23.68%	18,795	40.54%	23.74%	8.66%	12.51%	44.91%	53.79%	1
103	59725	0.36%	43964	8801	20.02%	21,427	48.74%	19.94%	10.38%	6.98%	37.30%	61.33%	1
104	58654	-1.44%	42236	12480	29.55%	20,548	48.65%	23.36%	8.42%	5.13%	36.91%	62.22%	1
105	58966	-0.92%	41844	19286	46.09%	12,357	29.53%	43.96%	10.16%	5.49%	59.60%	39.44%	1
106	58654	-1.44%	43493	21269	48.90%	13,917	32.00%	47.95%	7.37%	5.28%	60.60%	38.73%	1
107	59972	0.77%	43794	18994	43.37%	17,083	39.01%	40.25%	6.01%	4.90%	51.16%	46.81%	1
108	58895	-1.04%	43797	9562	21.83%	16,906	38.60%	24.10%	10.19%	12.45%	46.75%	52.14%	1
109	60125	1.03%	45782	25592	55.90%	14,022	30.63%	49.97%	5.30%	4.07%	59.35%	38.78%	1
110	60333	1.38%	45293	23724	52.38%	17,438	38.50%	50.47%	4.12%	0.81%	55.40%	45.30%	1
111	59060	-0.76%	43574	24296	55.76%	14,801	33.97%	50.20%	4.66%	2.09%	56.95%	41.86%	0
112	60318	1.36%	45032	24145	53.62%	17,470	38.79%	51.59%	3.44%	0.62%	55.64%	43.81%	0
113	59606	0.16%	45523	25915	56.93%	15,353	33.73%	52.80%	2.86%	2.31%	57.96%	40.48%	1
114	59460	-0.09%	44583	9619	21.58%	29,300	65.72%	22.50%	4.32%	1.34%	28.17%	71.48%	1
115	59186	-0.55%	44678	5913	13.23%	34,585	77.41%	10.69%	2.61%	1.68%	14.99%	84.22%	1
116	59175	-0.56%	43703	5104	11.68%	30,740	70.34%	9.13%	6.05%	5.22%	20.40%	78.42%	1
117	59968	0.77%	49540	8470	17.10%	33,403	67.43%	18.88%	3.56%	2.45%	24.89%	74.11%	1
118	60268	1.27%	49965	13150	26.32%	28,246	56.53%	31.60%	5.39%	3.94%	40.93%	58.16%	1
119	60064	0.93%	43964	3440	7.82%	35,104	79.85%	8.06%	4.11%	2.52%	14.69%	84.90%	1
120	59968	0.77%	48143	12604	26.18%	30,811	64.00%	29.90%	2.17%	0.98%	33.06%	66.44%	1
121	59056	-0.76%	43180	10383	24.05%	27,549	63.80%	25.49%	6.11%	1.64%	33.23%	65.10%	1
122	58712	-1.34%	43395	6465	14.90%	30,535	70.37%	13.05%	4.42%	5.07%	22.54%	76.50%	1
123	59314	-0.33%	45628	9401	20.60%	29,916	65.57%	15.74%	3.70%	3.58%	23.02%	75.81%	1
124	59743	0.39%	48100	24637	51.22%	19,752	41.06%	51.31%	2.74%	2.00%	56.05%	43.54%	1
125	60329	1.37%	44930	26323	58.59%	15,698	34.94%	57.91%	2.98%	0.57%	61.46%	37.55%	1
126	59319	-0.32%	45424	24204	53.28%	18,722	41.22%	55.29%	3.36%	1.34%	60.00%	38.97%	1
127	58981	-0.89%	45754	24122	52.72%	15,783	34.50%	55.89%	5.28%	1.67%	62.84%	36.58%	1
128	59778	0.45%	46116	25887	56.13%	18,659	40.46%	55.20%	1.76%	0.30%	57.26%	42.68%	1
129	59024	-0.82%	44755	9436	21.08%	32,096	71.71%	20.34%	2.32%	0.43%	23.10%	75.93%	1
130	59587	0.13%	46284	7170	15.49%	36,697	79.29%	14.16%	0.86%	1.09%	16.11%	82.24%	1
131	60330	1.38%	47377	11910	25.14%	33,124	69.92%	26.87%	1.81%	0.49%	29.18%	70.09%	1
132	58773	-1.24%	45237	20829	46.04%	21,329	47.15%	47.57%	1.51%	0.76%	49.84%	50.07%	1

## Georgia State House --Illustrative Plan

District	2020 Pop.	% 2020 Deviation	18+ Pop	18+ AP Black	% 18+ AP Black	18+ NH White	% 18+ NH White	2015-19 BCVAP*	2015-19 LCVAP*	2015-19 ACVAP*	2015-19 B+L+A CVAP*	2015-19 NH White CVAP*	Incumbent
133	59012	-0.84%	45765	8177	17.87%	34,472	75.32%	19.52%	2.96%	0.73%	23.22%	75.96%	1
134	60267	1.27%	46314	10009	21.61%	29,026	62.67%	19.90%	6.01%	4.70%	30.61%	67.71%	1
135	60394	1.48%	46220	23789	51.47%	18,003	38.95%	53.09%	4.18%	0.99%	58.25%	40.34%	1
136	60319	1.36%	45737	27518	60.17%	13,921	30.44%	57.53%	5.86%	1.70%	65.09%	34.09%	1
137	59571	0.10%	44675	1706	3.82%	31,094	69.60%	3.45%	5.31%	4.53%	13.29%	85.84%	0
138	60369	1.44%	45111	23620	52.36%	16,367	36.28%	52.83%	6.87%	1.77%	61.47%	38.14%	2
139	58655	-1.44%	46825	24816	53.00%	18,739	40.02%	55.23%	2.73%	0.38%	58.34%	41.80%	1
140	60207	1.17%	45762	11455	25.03%	29,127	63.65%	24.02%	3.46%	3.81%	31.28%	68.36%	1
141	59635	0.21%	46376	12450	26.85%	30,458	65.68%	25.55%	2.09%	2.24%	29.87%	69.00%	2
142	59571	0.10%	43807	27567	62.93%	13,843	31.60%	65.19%	1.30%	1.17%	67.66%	32.01%	1
143	60158	1.09%	47032	27762	59.03%	15,915	33.84%	57.23%	1.79%	1.08%	60.09%	39.21%	1
144	59035	-0.80%	48160	24301	50.46%	21,594	44.84%	52.63%	1.54%	0.50%	54.67%	45.27%	1
145	58689	-1.38%	46521	9826	21.12%	33,949	72.98%	22.47%	1.80%	0.75%	25.02%	74.06%	1
146	60272	1.28%	45763	12384	27.06%	28,835	63.01%	27.14%	4.13%	1.57%	32.85%	66.03%	0
147	60203	1.16%	45383	18665	41.13%	21,260	46.85%	40.96%	3.64%	1.24%	45.84%	52.90%	1
148	59568	0.10%	45905	15626	34.04%	27,593	60.11%	35.71%	2.16%	0.32%	38.20%	61.19%	2
149	60393	1.48%	47506	13263	27.92%	30,684	64.59%	29.33%	1.92%	0.63%	31.88%	67.59%	2
150	59281	-0.39%	44290	13864	31.30%	25,589	57.78%	27.78%	4.75%	0.47%	33.00%	65.64%	1
151	60241	1.23%	47603	26961	56.64%	17,328	36.40%	57.36%	1.68%	1.19%	60.24%	39.24%	1
152	60383	1.47%	46089	12491	27.10%	30,436	66.04%	27.87%	2.59%	1.59%	32.06%	66.29%	1
153	60315	1.35%	46133	26737	57.96%	17,158	37.19%	60.08%	1.10%	0.48%	61.65%	37.39%	1
154	60120	1.02%	47053	28682	60.96%	17,009	36.15%	61.51%	0.93%	0.11%	62.54%	36.86%	2
155	60299	1.32%	46955	13625	29.02%	30,108	64.12%	30.29%	2.36%	0.47%	33.11%	66.51%	1
156	60310	1.34%	45966	11261	24.50%	29,666	64.54%	27.56%	6.18%	0.41%	34.15%	65.17%	1
157	60385	1.47%	43879	8911	20.31%	29,670	67.62%	18.78%	5.30%	1.53%	25.60%	73.24%	1
158	59899	0.65%	46645	13389	28.70%	30,321	65.00%	29.75%	1.83%	0.18%	31.75%	67.67%	1
159	60289	1.31%	45813	13511	29.49%	29,922	65.31%	30.64%	1.58%	0.61%	32.83%	66.49%	1
160	60376	1.45%	48275	13686	28.35%	30,410	62.99%	29.21%	2.71%	0.95%	32.86%	66.60%	1
161	58778	-1.23%	43577	7209	16.54%	30,951	71.03%	14.95%	3.31%	1.76%	20.01%	78.46%	1
162	58812	-1.17%	46024	23512	51.09%	15,576	33.84%	59.67%	3.65%	0.72%	64.03%	35.84%	1
163	60132	1.04%	47437	20998	44.27%	20,284	42.76%	46.97%	5.54%	1.84%	54.36%	44.68%	0
164	58706	-1.35%	45361	12592	27.76%	26,566	58.57%	27.25%	4.80%	2.73%	34.78%	64.27%	1
165	58747	-1.28%	47382	21620	45.63%	21,089	44.51%	55.42%	2.77%	1.07%	59.26%	39.61%	1
166	60391	1.48%	49311	5197	10.54%	39,002	79.09%	10.98%	2.92%	2.90%	16.80%	82.62%	1
167	59467	-0.07%	44901	9385	20.90%	30,674	68.31%	24.06%	3.54%	0.83%	28.44%	70.51%	1
168	59770	0.44%	43539	20902	48.01%	15,893	36.50%	46.31%	11.58%	2.03%	59.92%	38.18%	1
169	59925	0.70%	45421	1798	3.96%	38,876	85.59%	2.53%	2.42%	0.88%	5.83%	93.29%	1
170	59423	-0.15%	45091	8842	19.61%	31,424	69.69%	18.27%	3.75%	1.04%	23.06%	76.67%	1
171	60381	1.46%	46194	16434	35.58%	25,712	55.66%	36.86%	2.56%	0.63%	40.04%	59.13%	0
172	59115	-0.67%	43781	12277	28.04%	24,085	55.01%	32.55%	6.73%	0.61%	39.88%	59.28%	1
173	60277	1.29%	46589	12839	27.56%	30,321	65.08%	27.32%	2.41%	0.62%	30.35%	68.75%	2
174	59569	0.10%	45564	10033	22.02%	31,381	68.87%	21.69%	2.09%	0.78%	24.56%	74.80%	1
175	60326	1.37%	44932	9409	20.94%	30,669	68.26%	20.09%	5.81%	0.92%	26.83%	71.60%	1
176	60139	1.06%	45709	11769	25.75%	28,225	61.75%	27.76%	5.20%	0.43%	33.39%	65.75%	1
177	59888	0.63%	45493	23477	51.61%	17,877	39.30%	50.02%	3.47%	1.87%	55.36%	44.57%	1
178	60261	1.26%	45780	7164	15.65%	34,933	76.31%	16.83%	3.21%	0.38%	20.42%	79.21%	1
179	59502	-0.02%	47468	12476	26.28%	30,835	64.96%	27.36%	2.91%	1.63%	31.90%	67.38%	1
180	60160	1.09%	45771	8338	18.22%	32,584	71.19%	19.63%	4.76%	1.59%	25.98%	72.79%	1

Total  
2020

Pop. 10,711,908

Majority Districts

2.96% 8,220,274

2,607,986

31.73%

4,342,333

52.82%

54

101

54

69

111

# **EXHIBIT A**

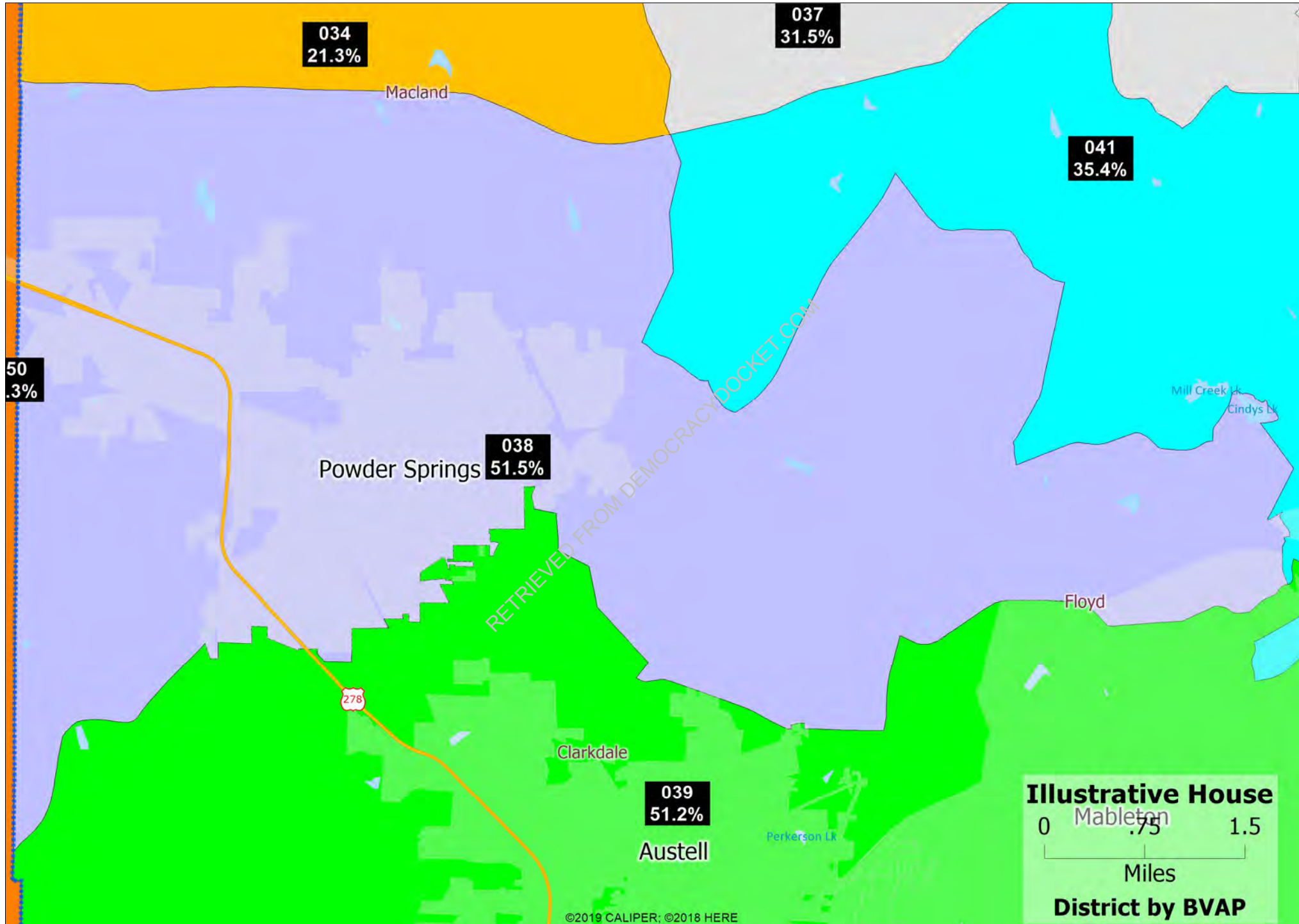
## **Part 4**

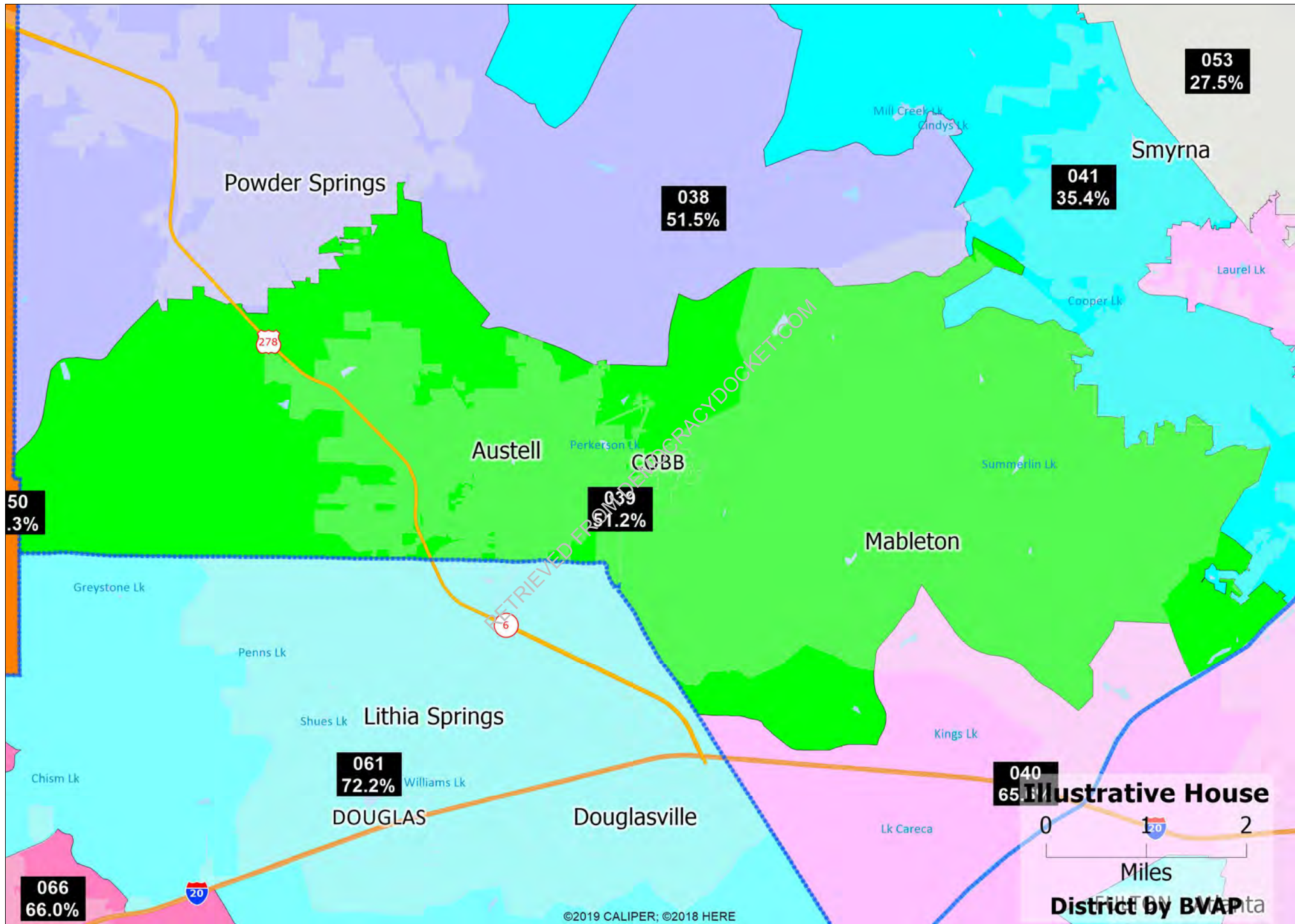
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# EXHIBIT AA

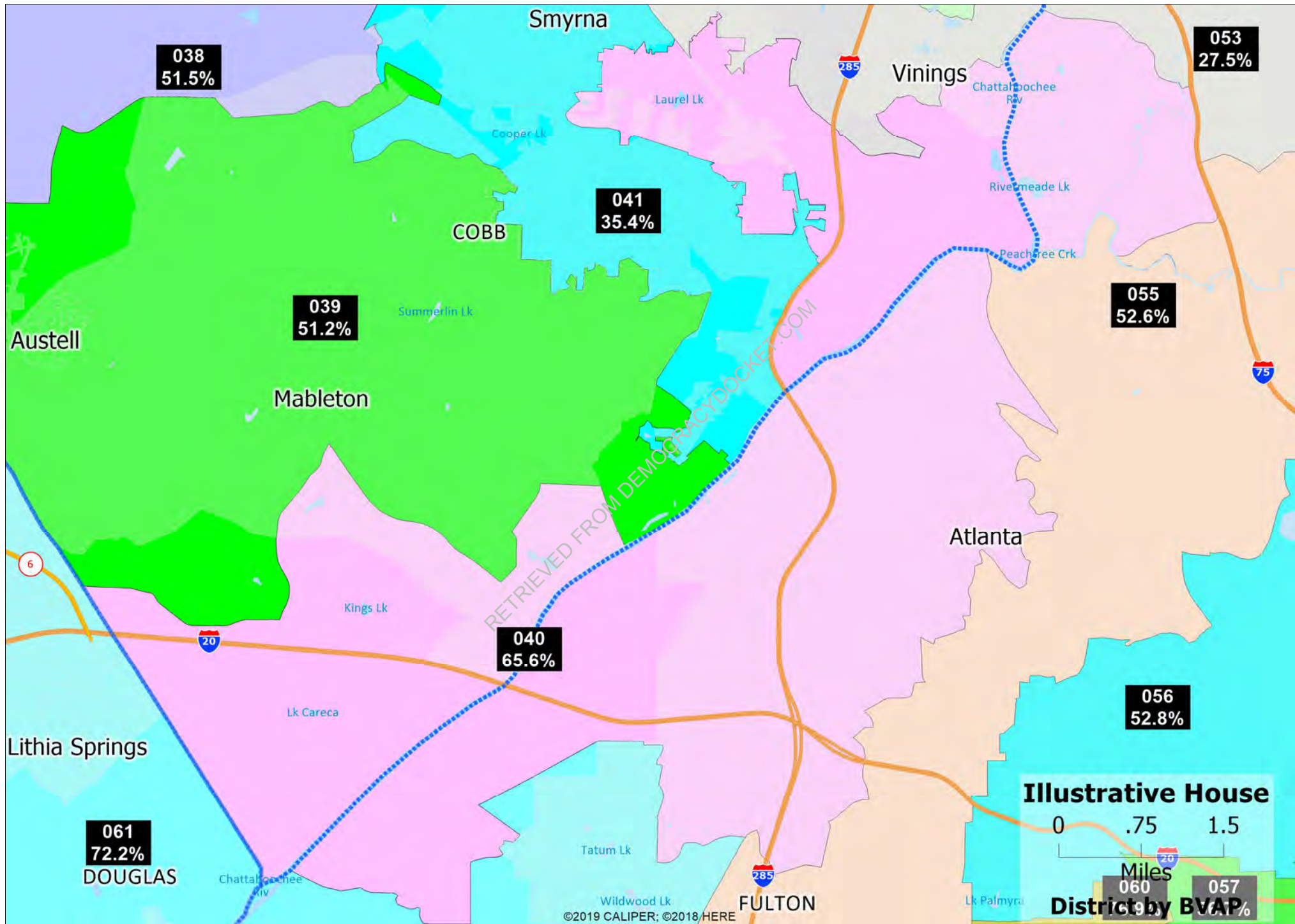
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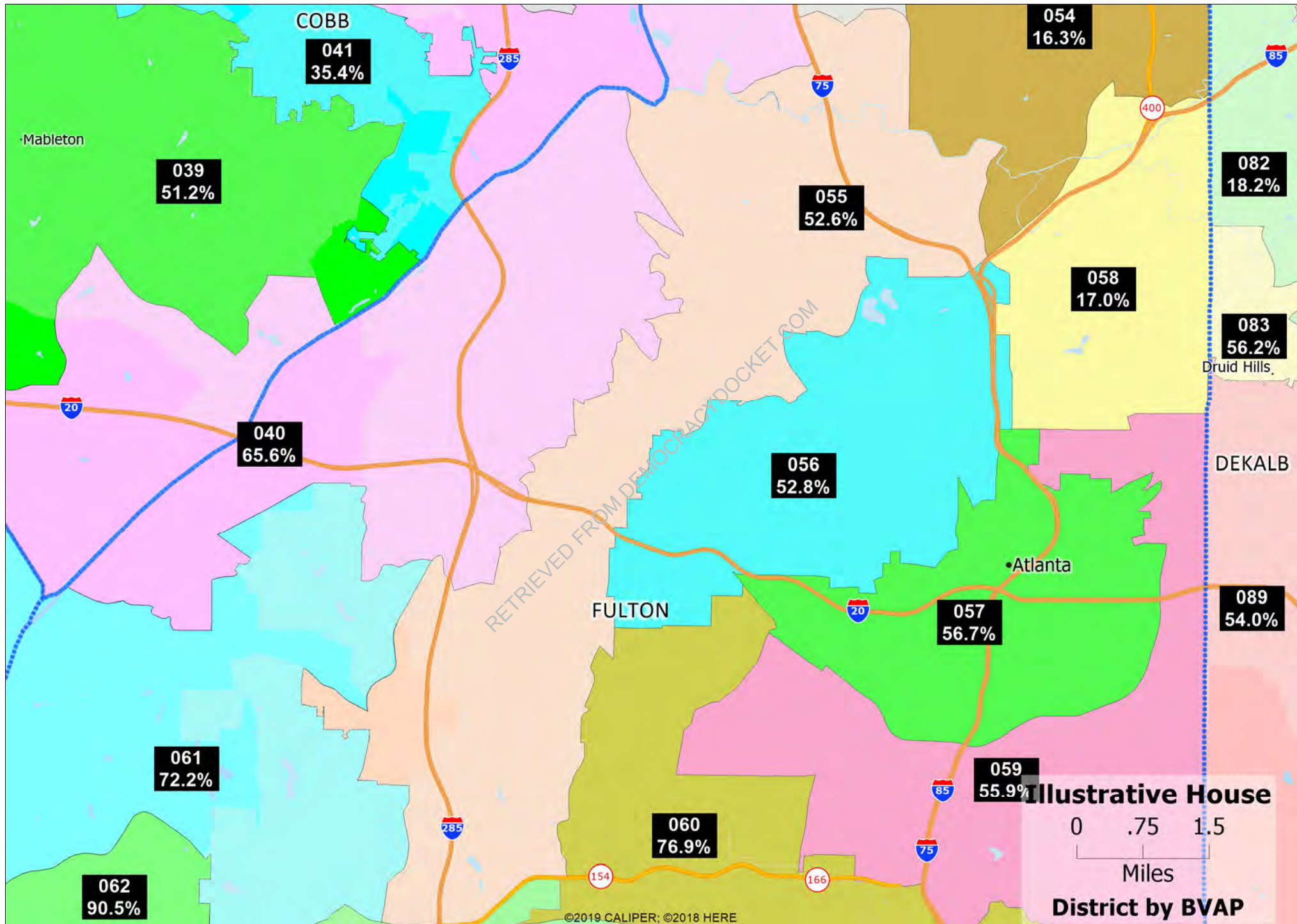




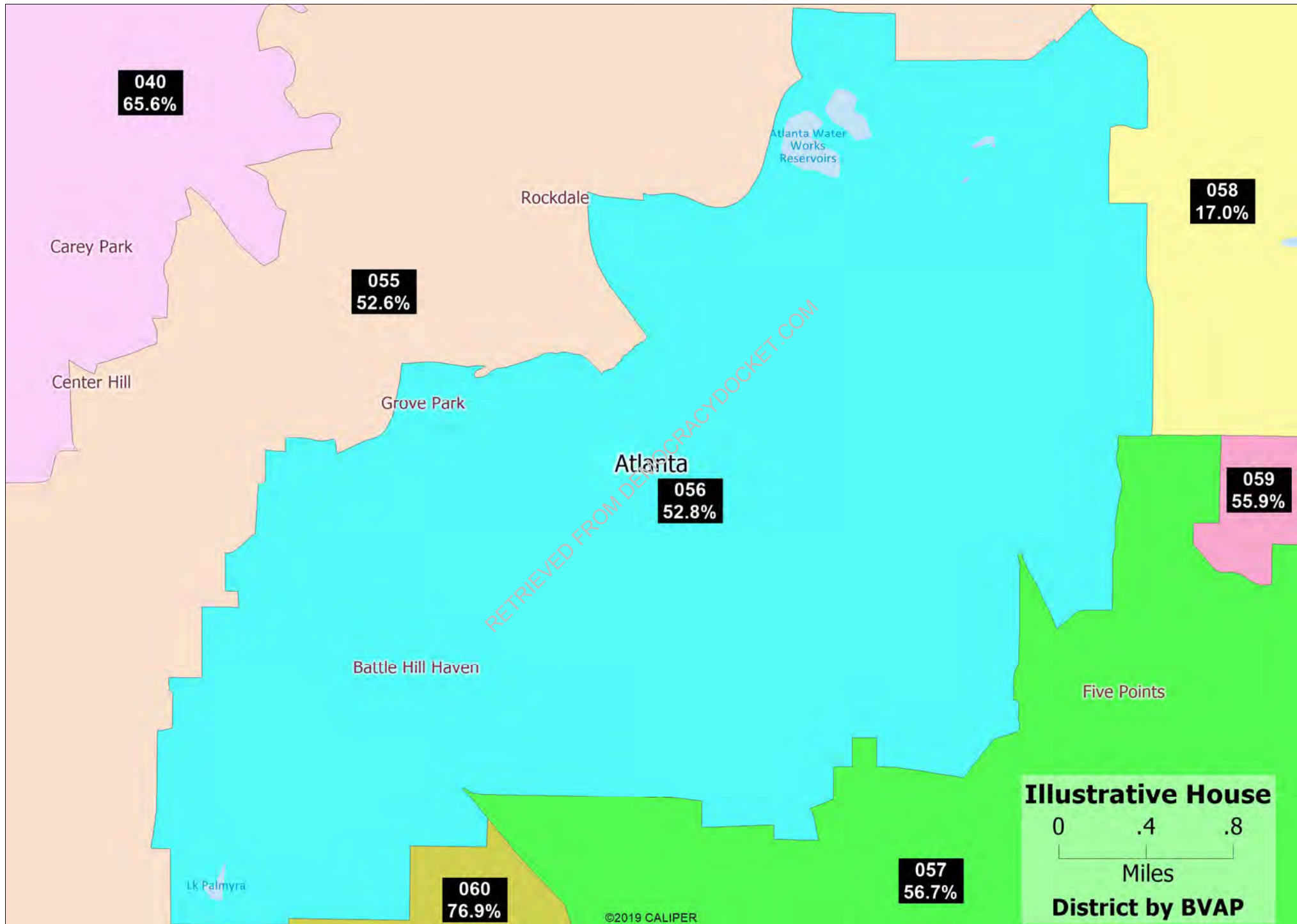




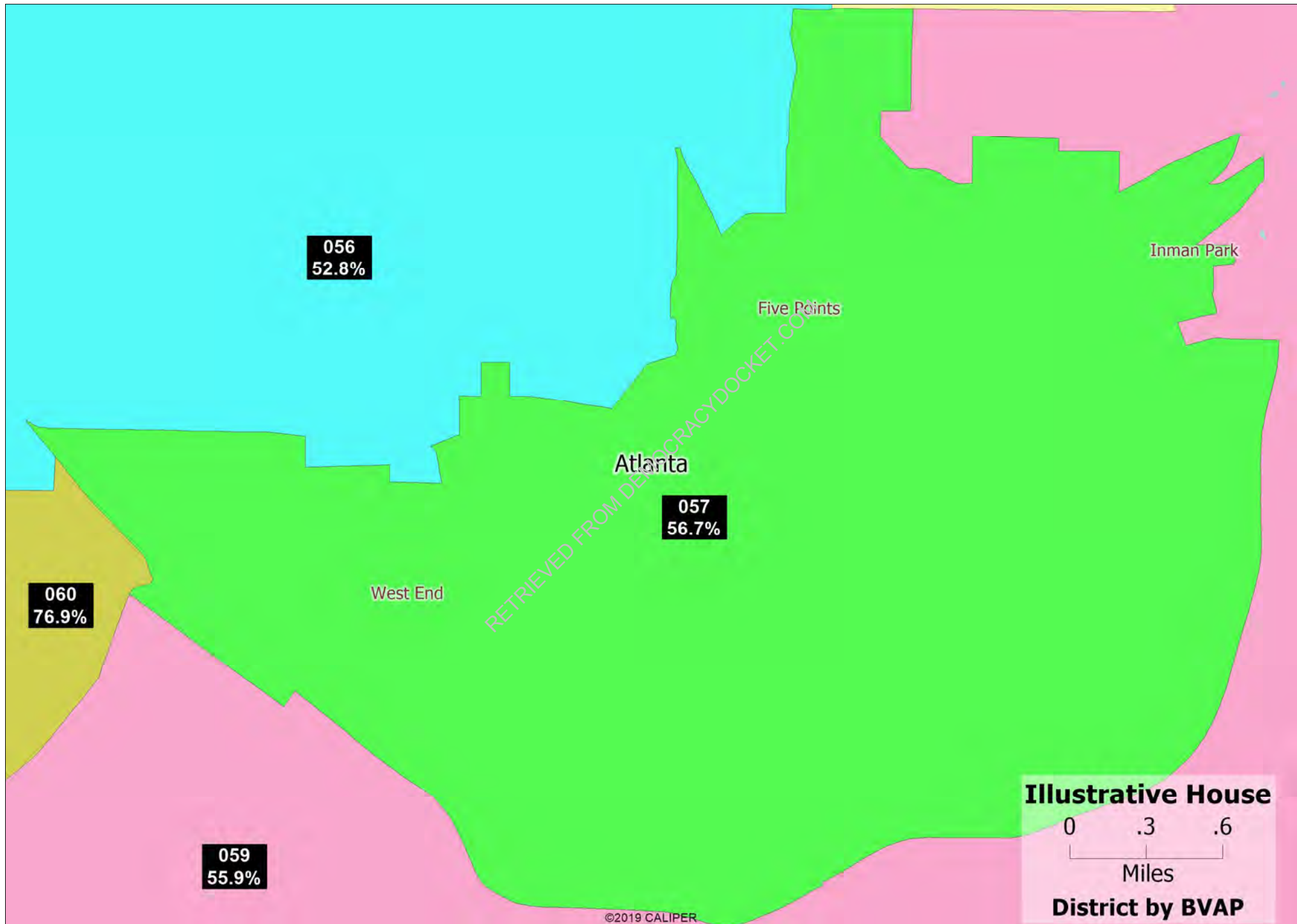


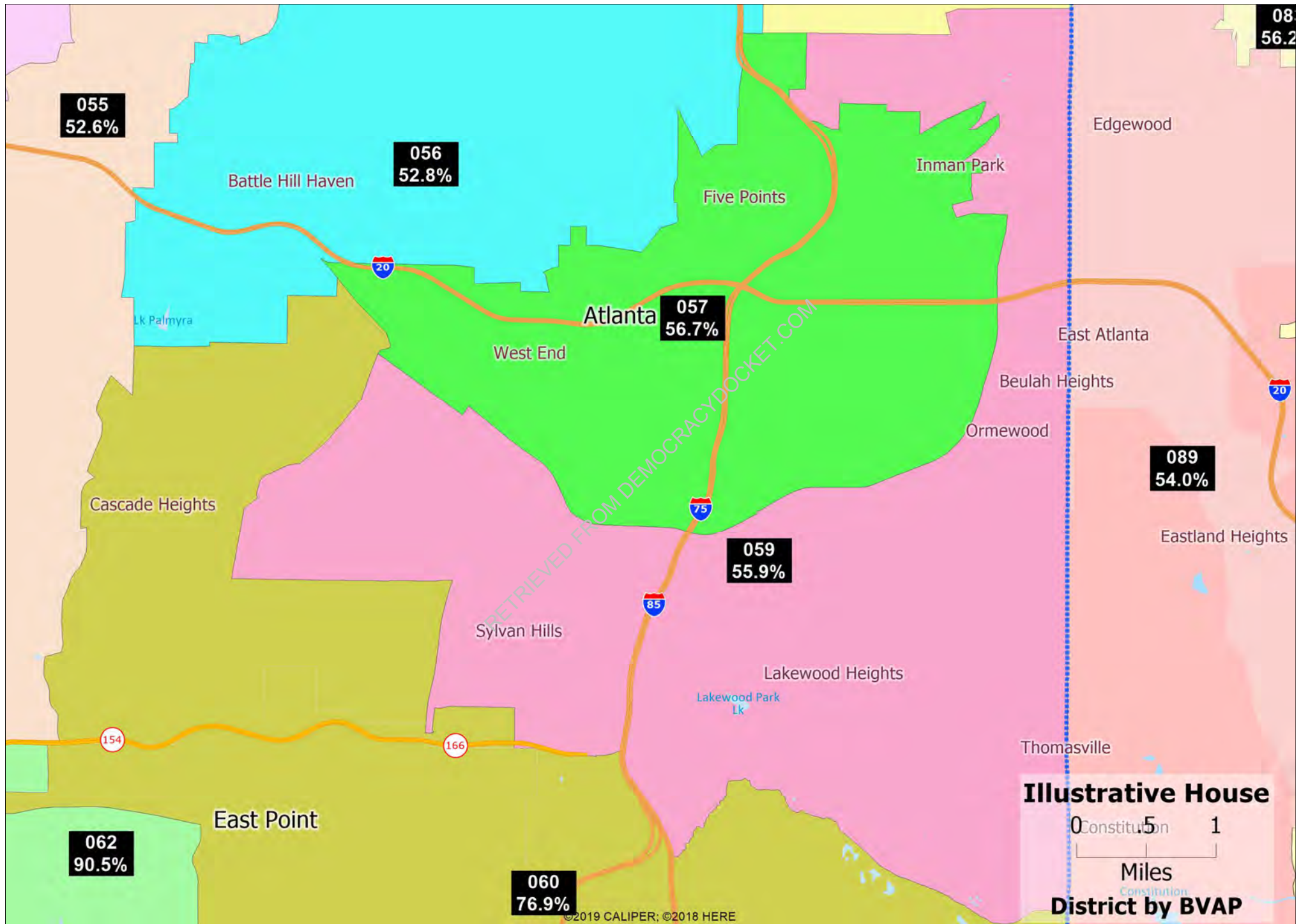


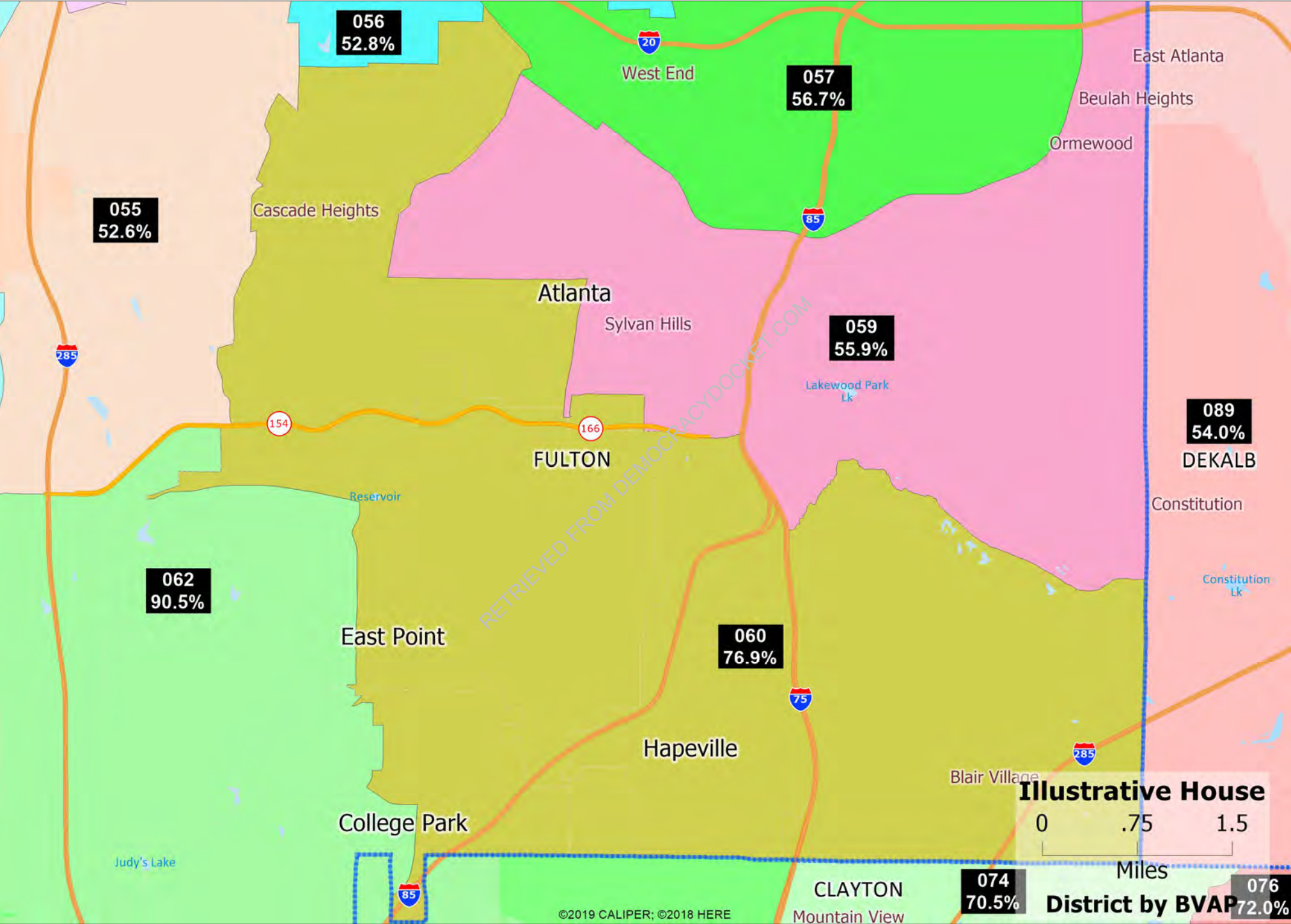




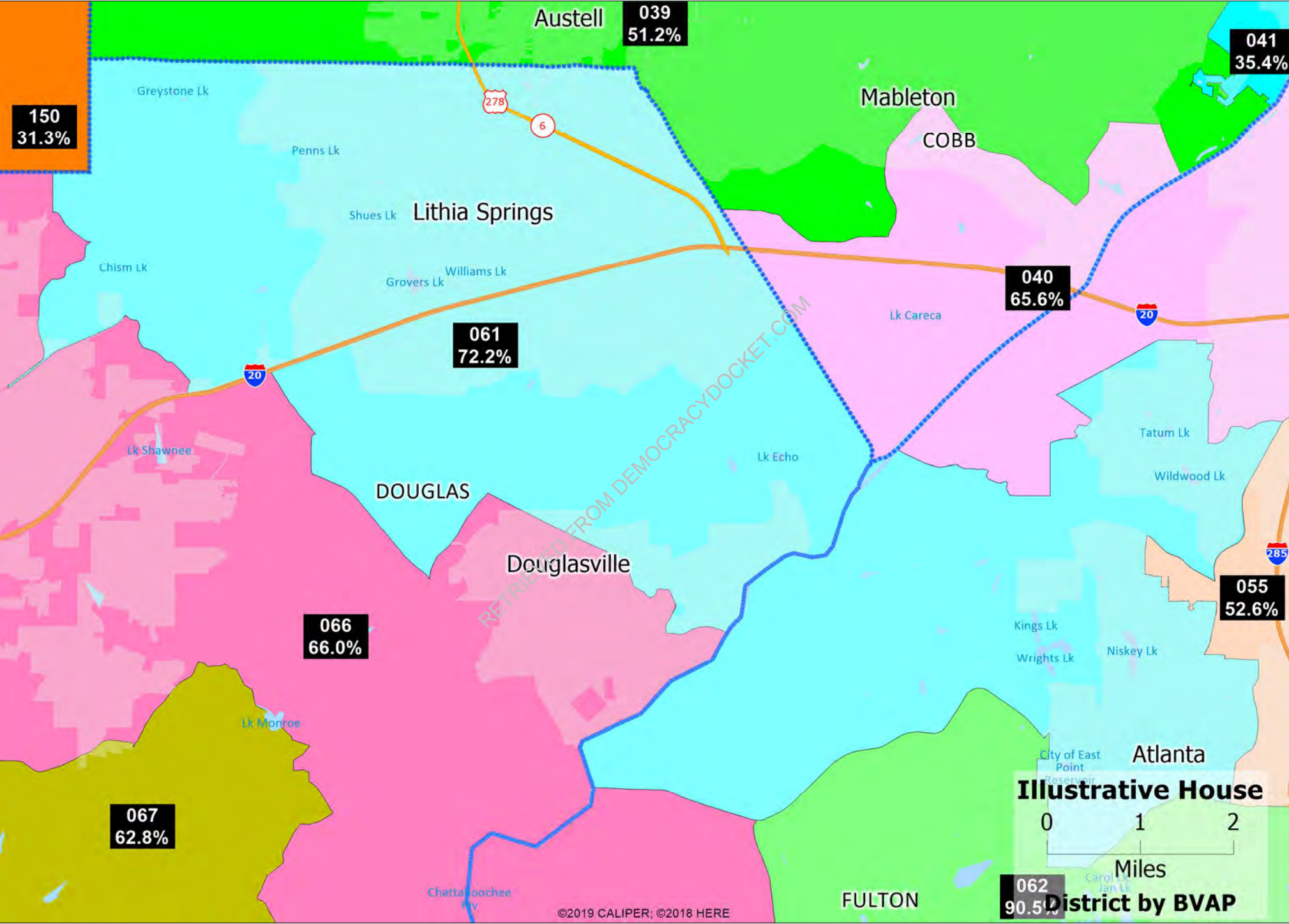


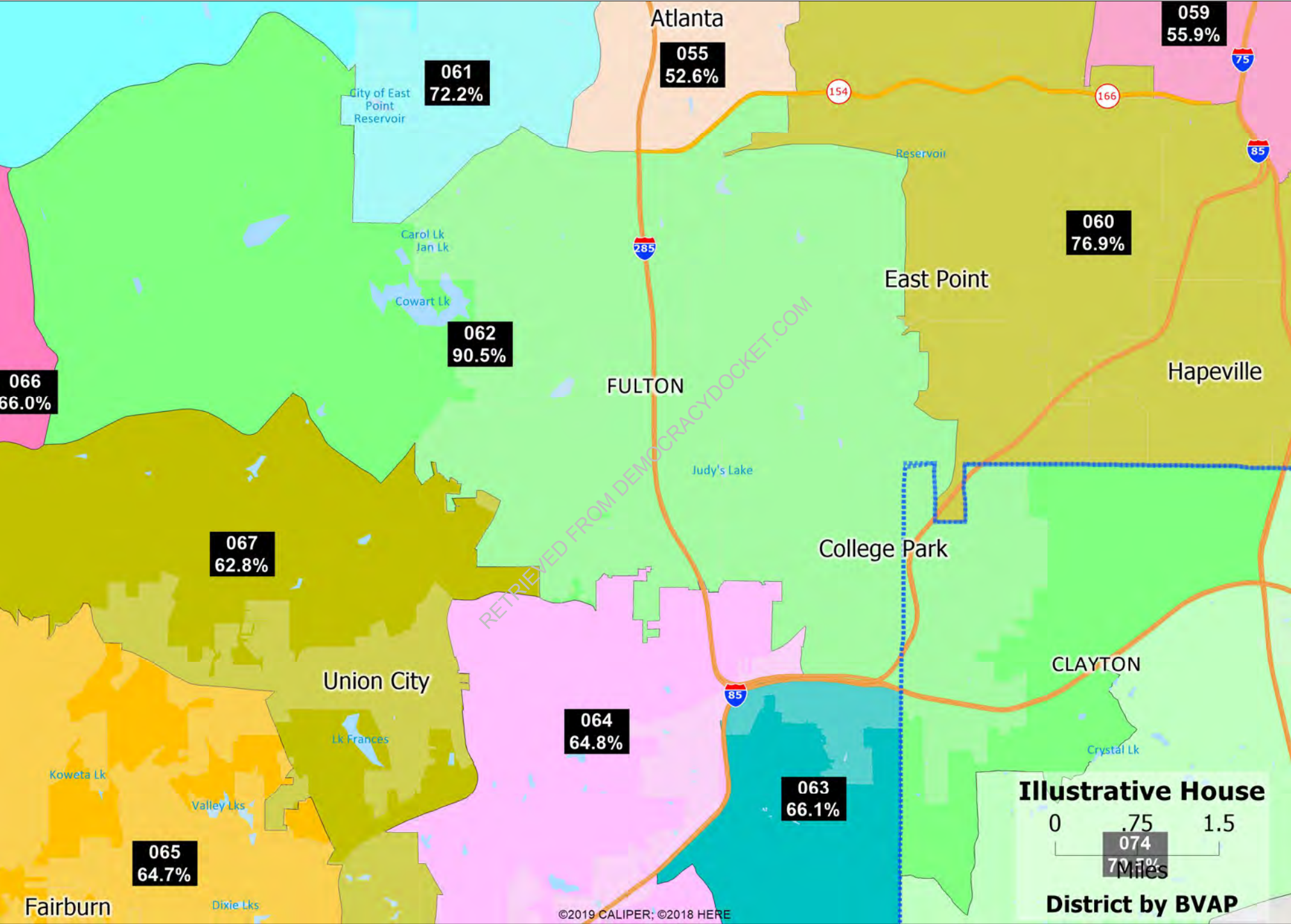




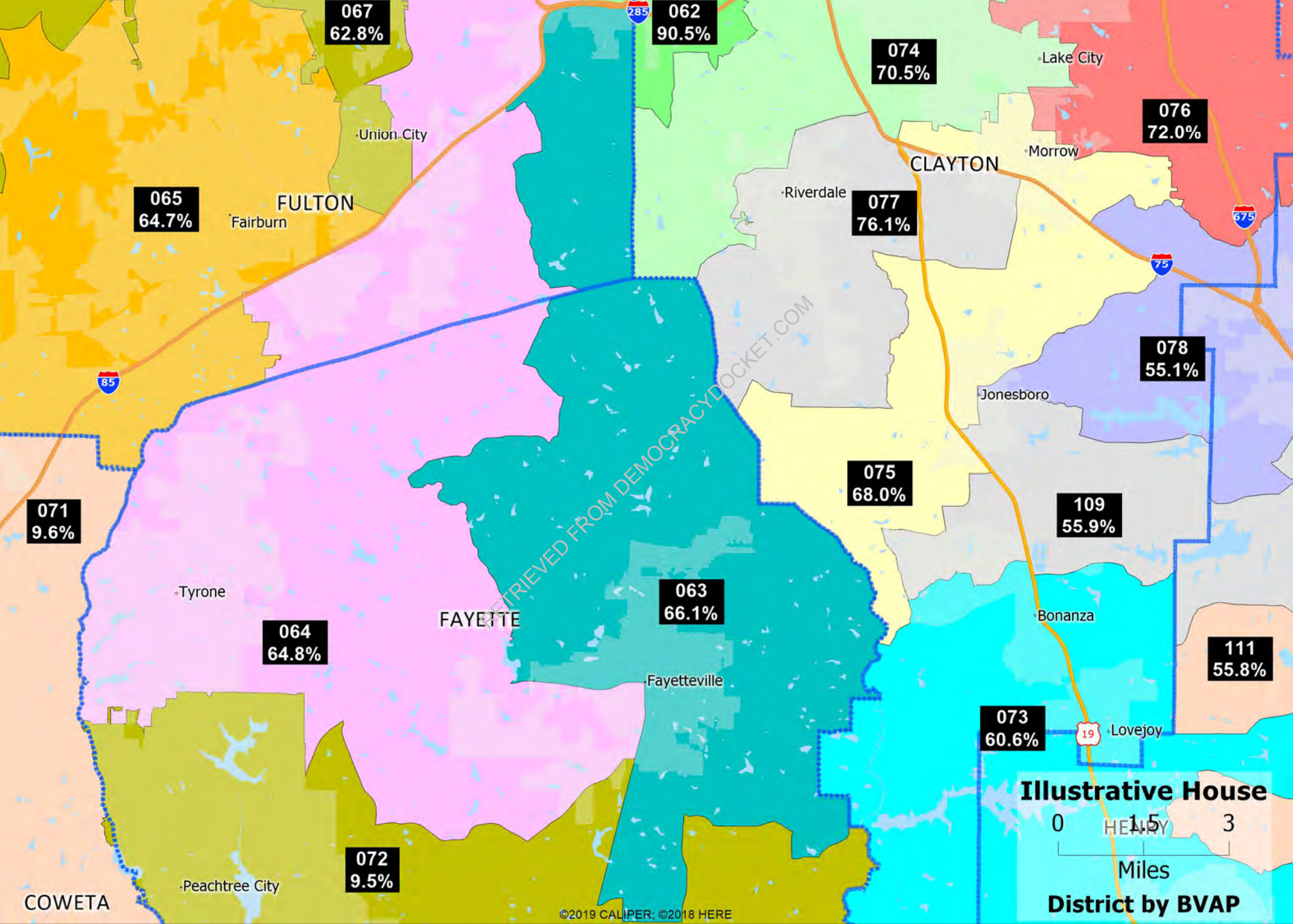




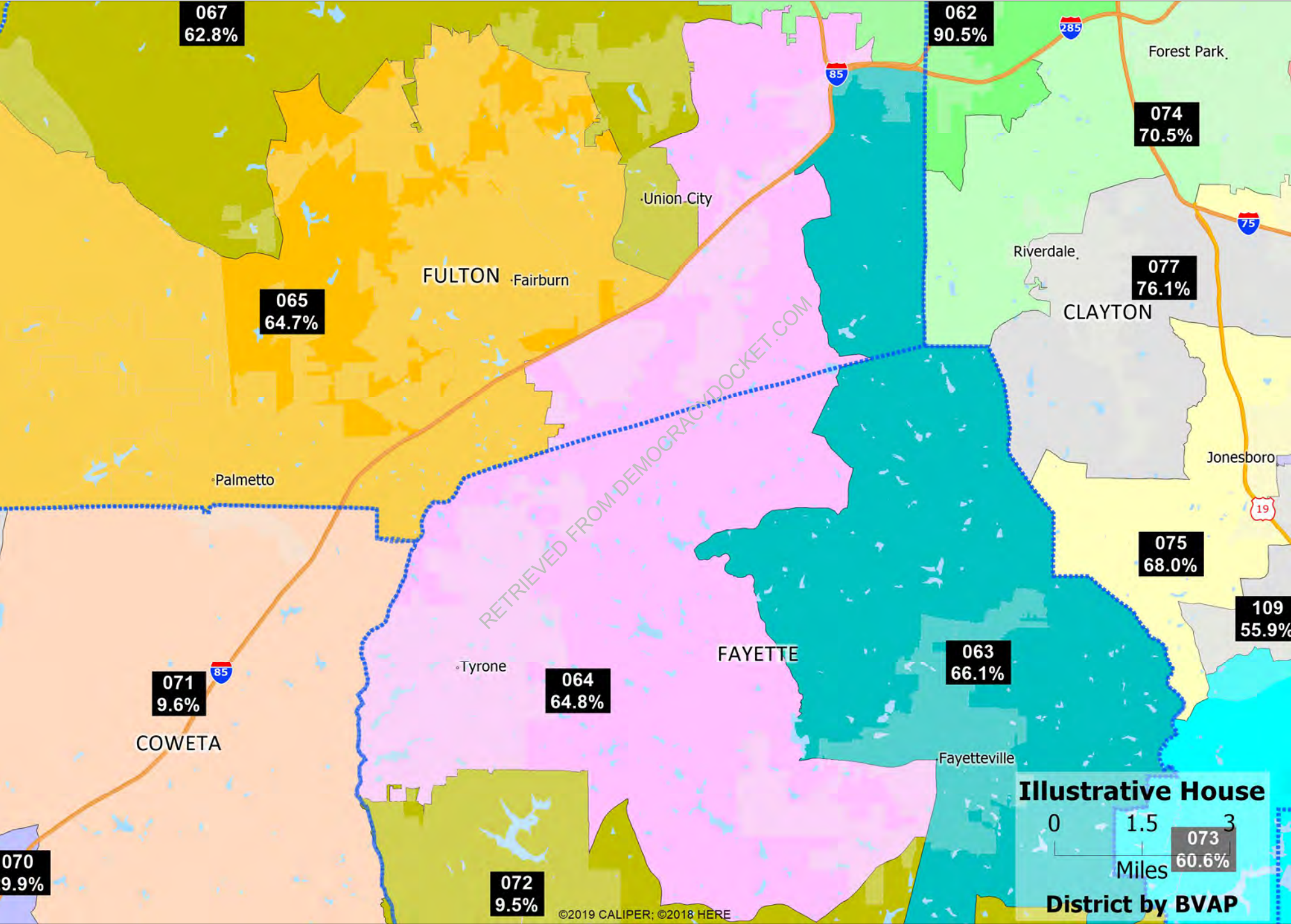


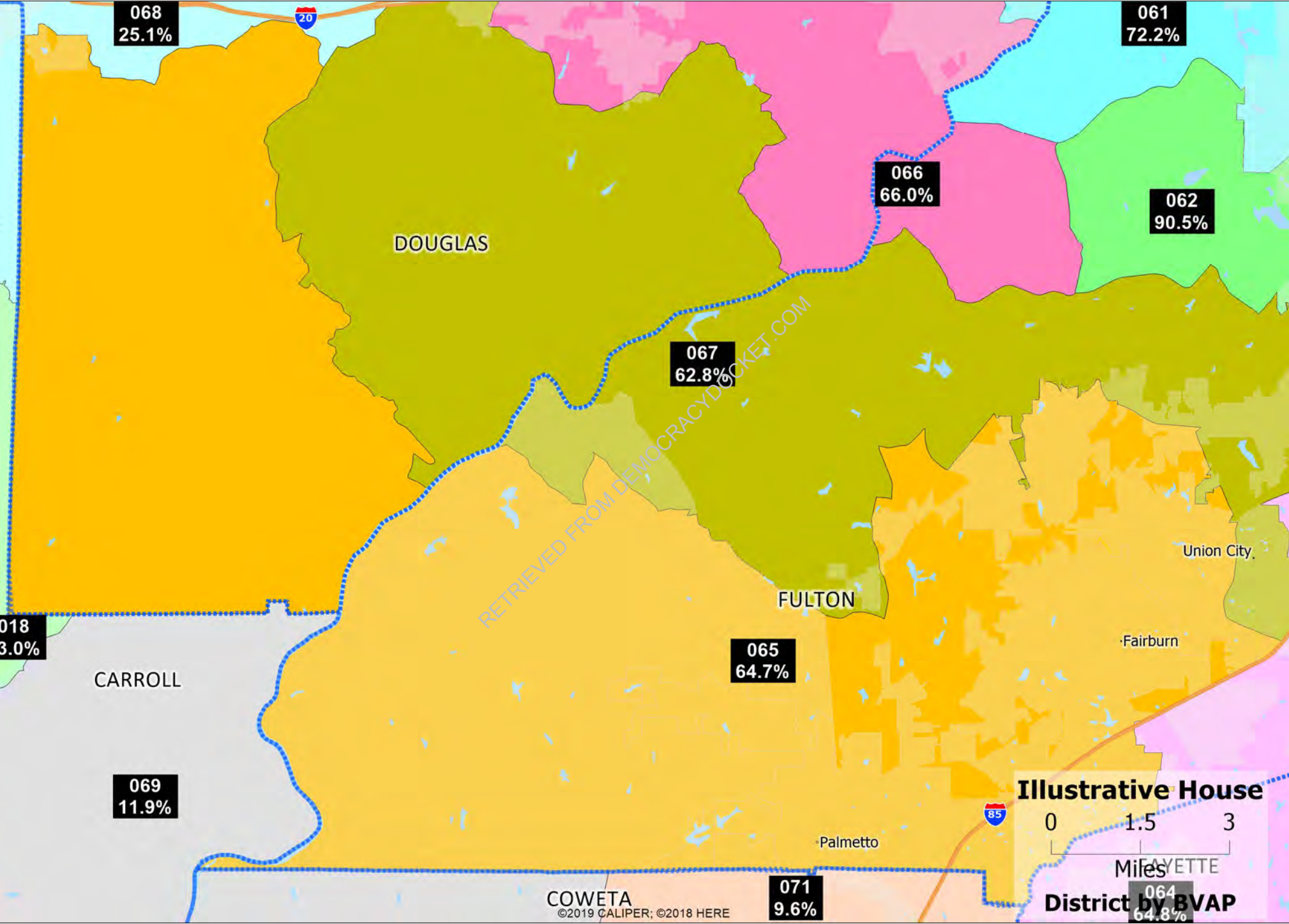




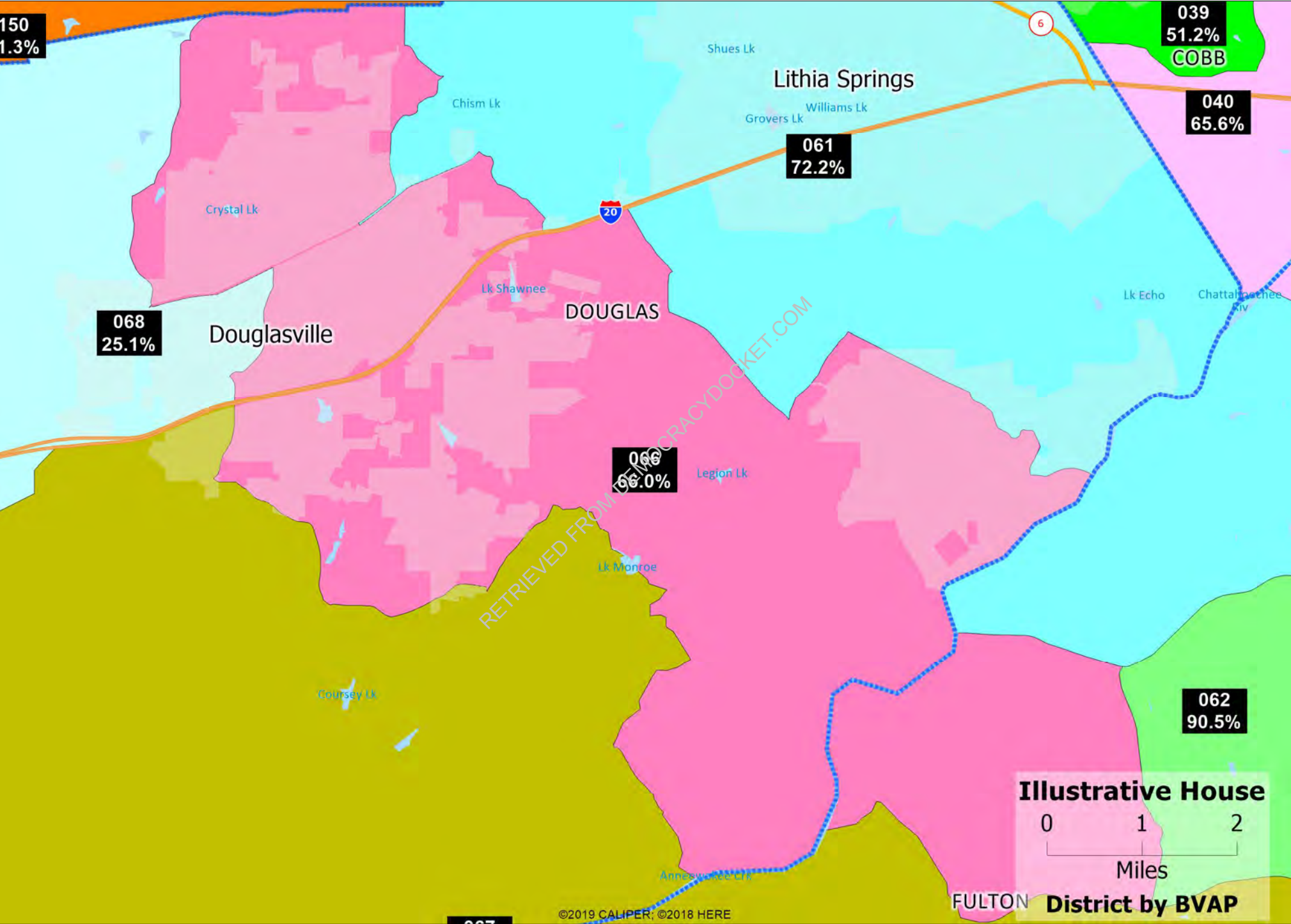


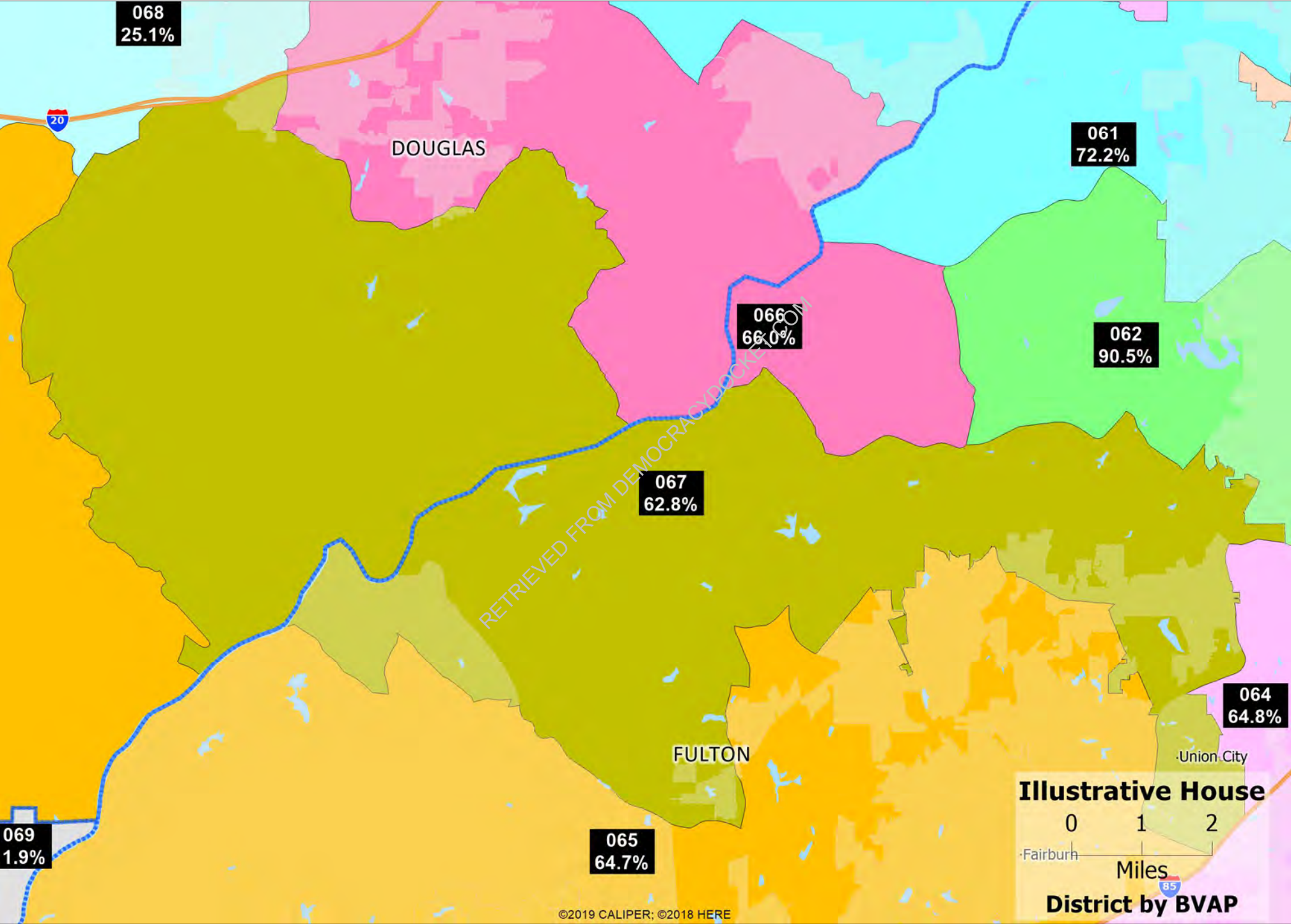




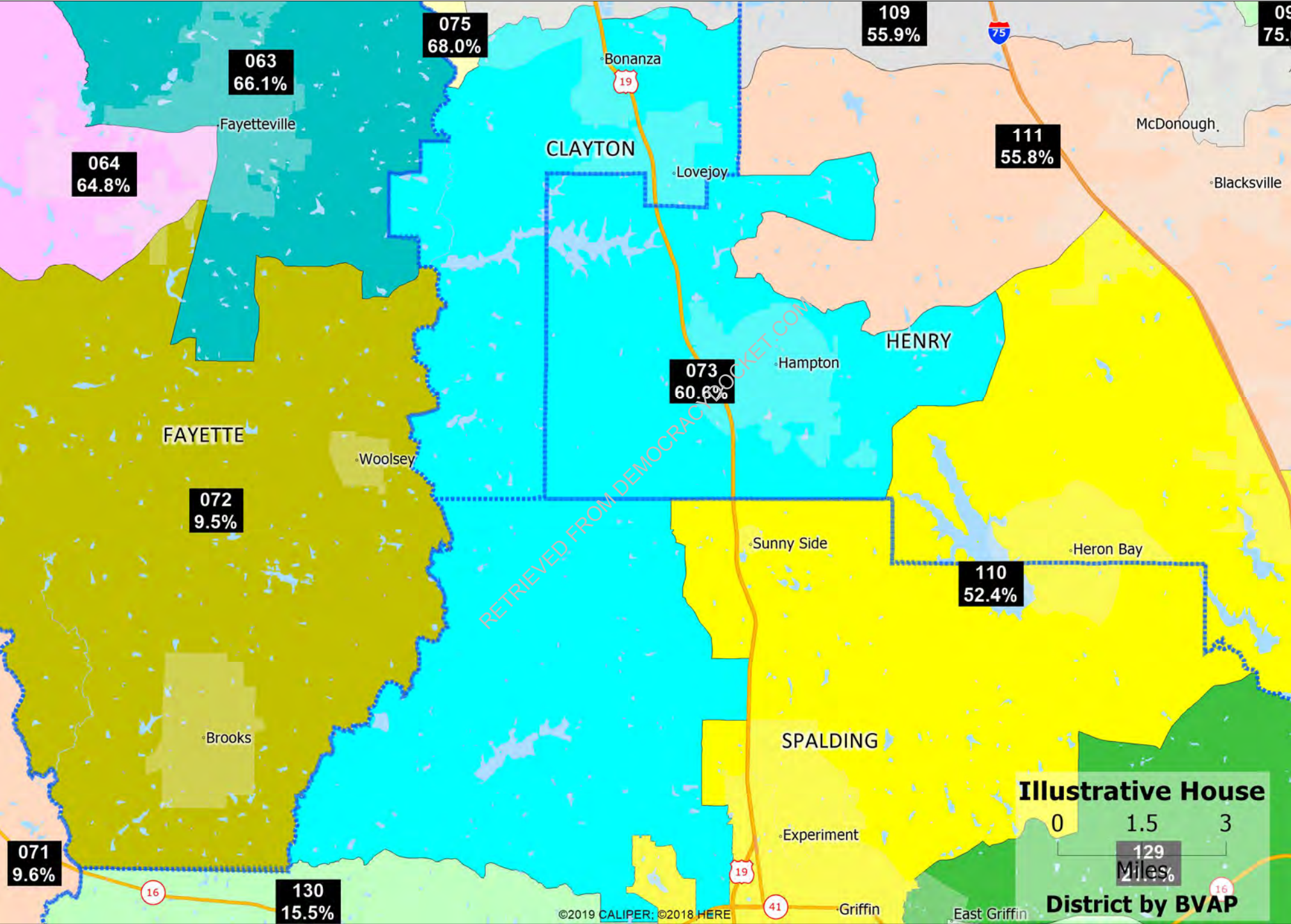


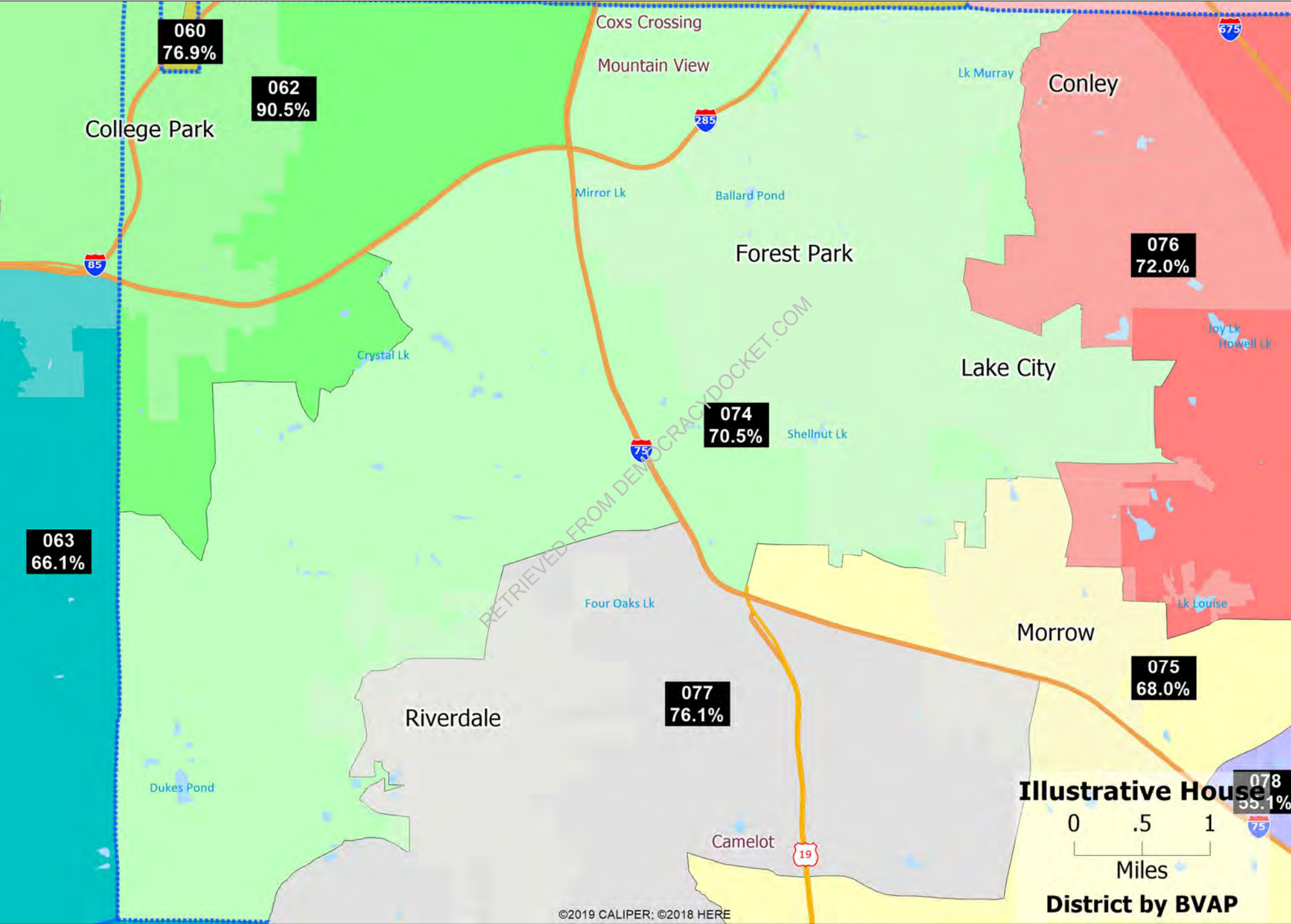




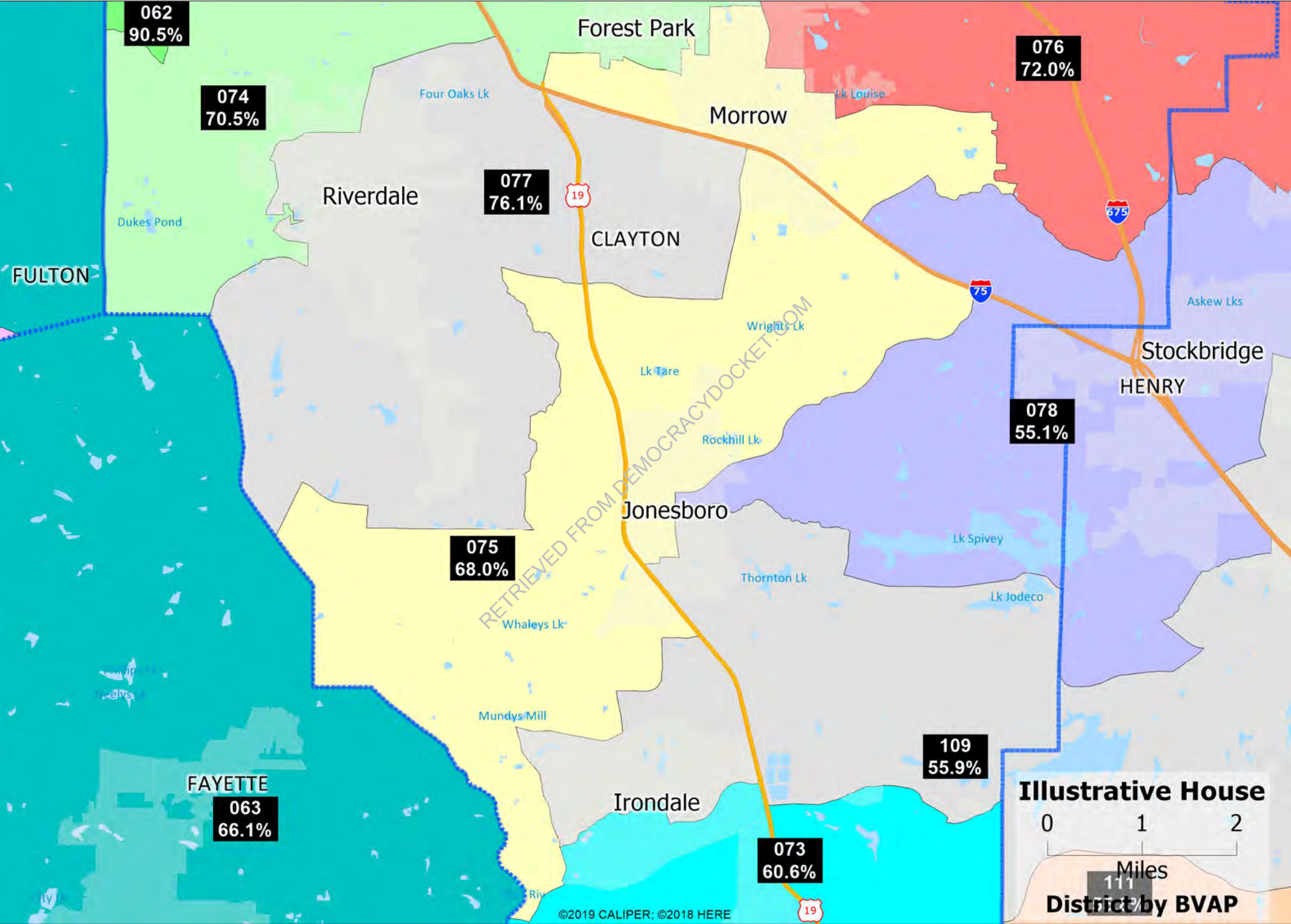


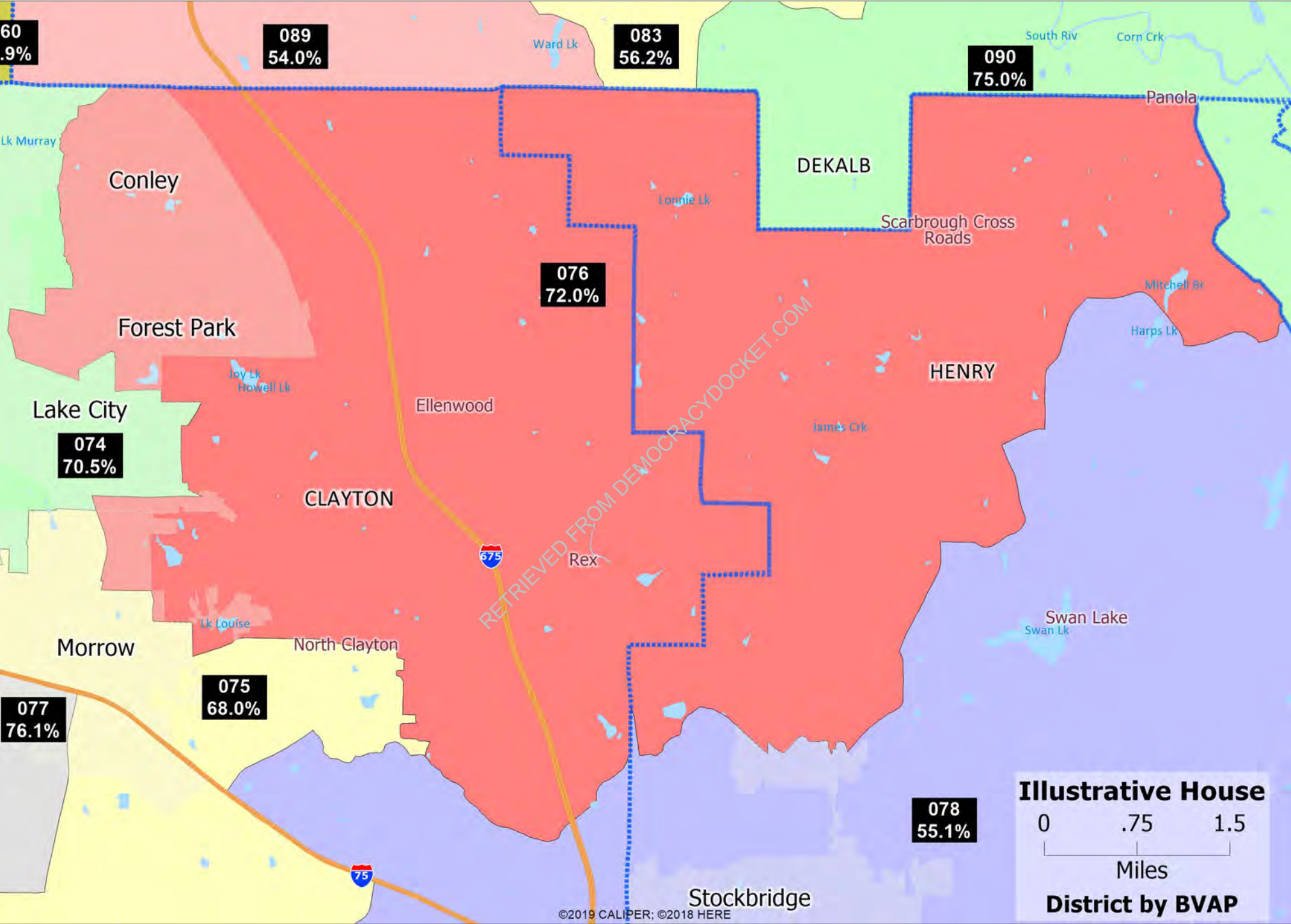




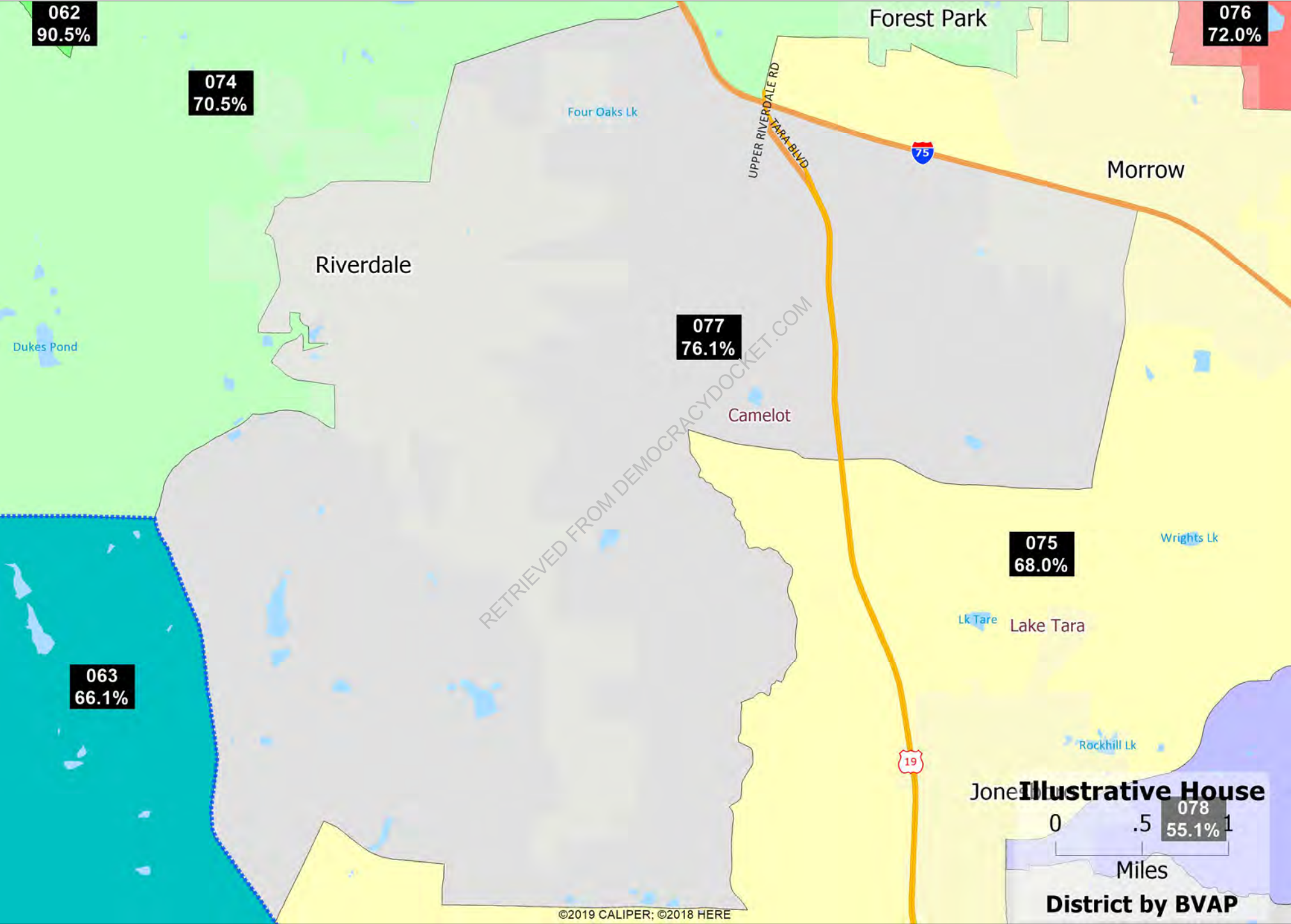


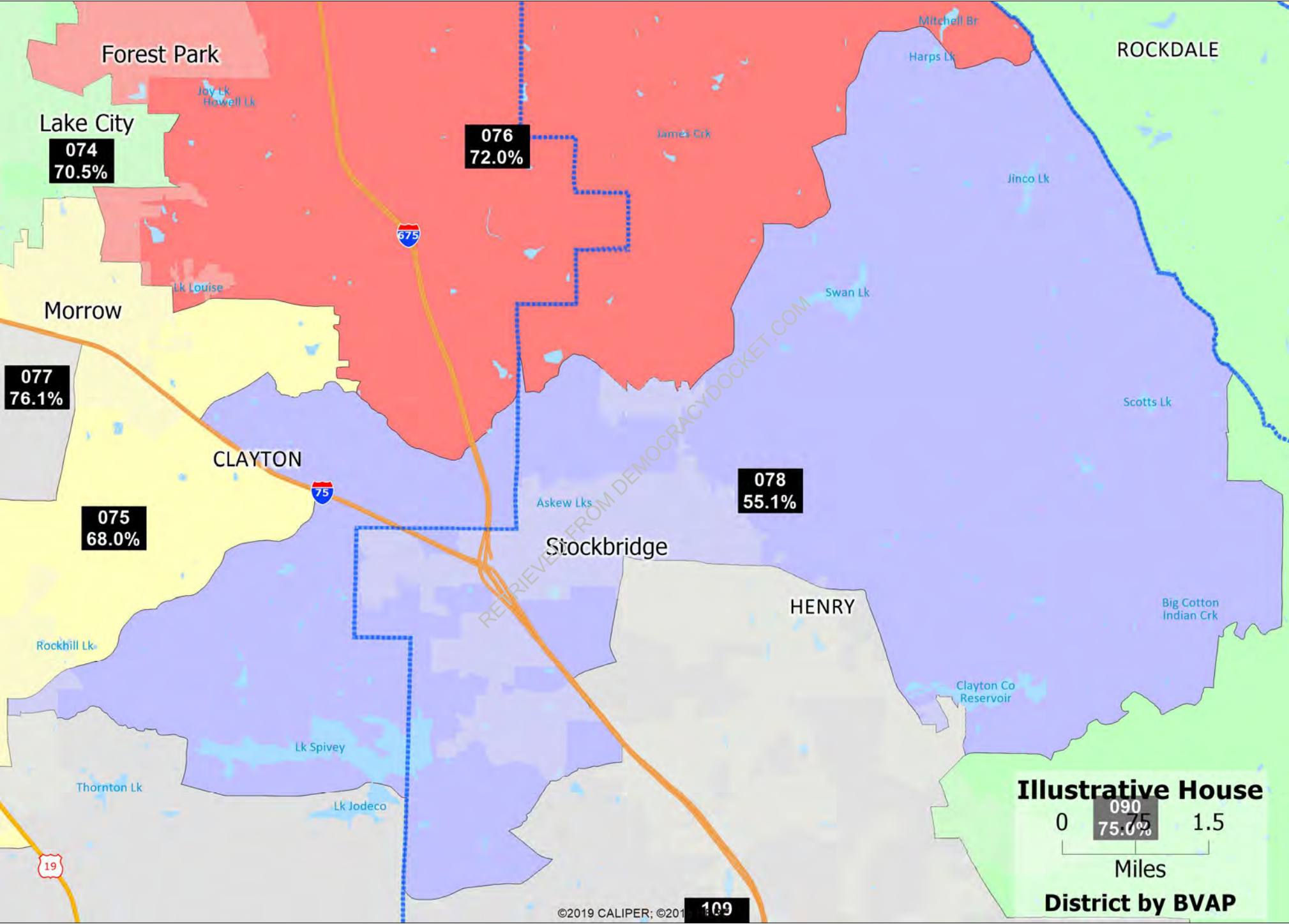




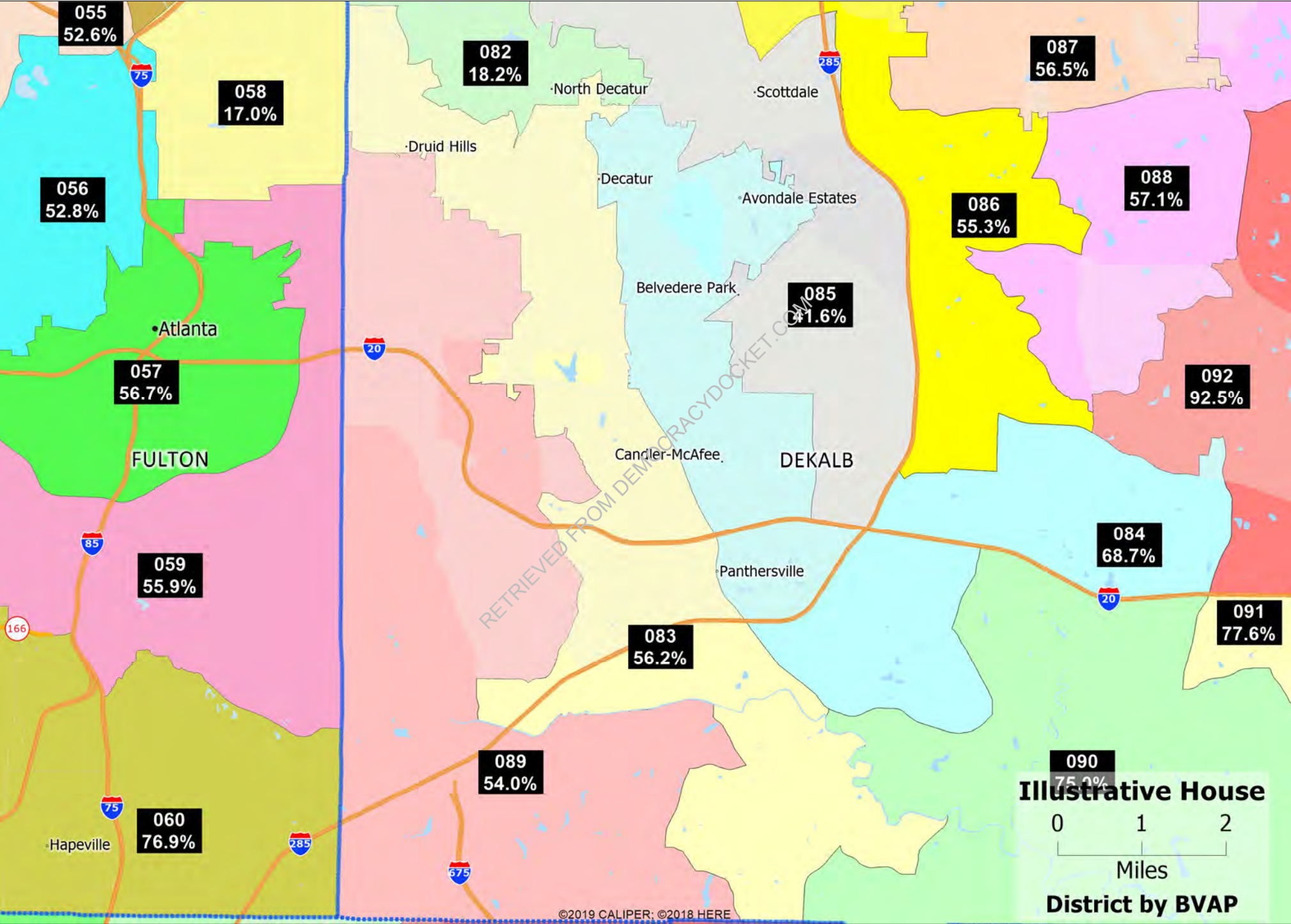


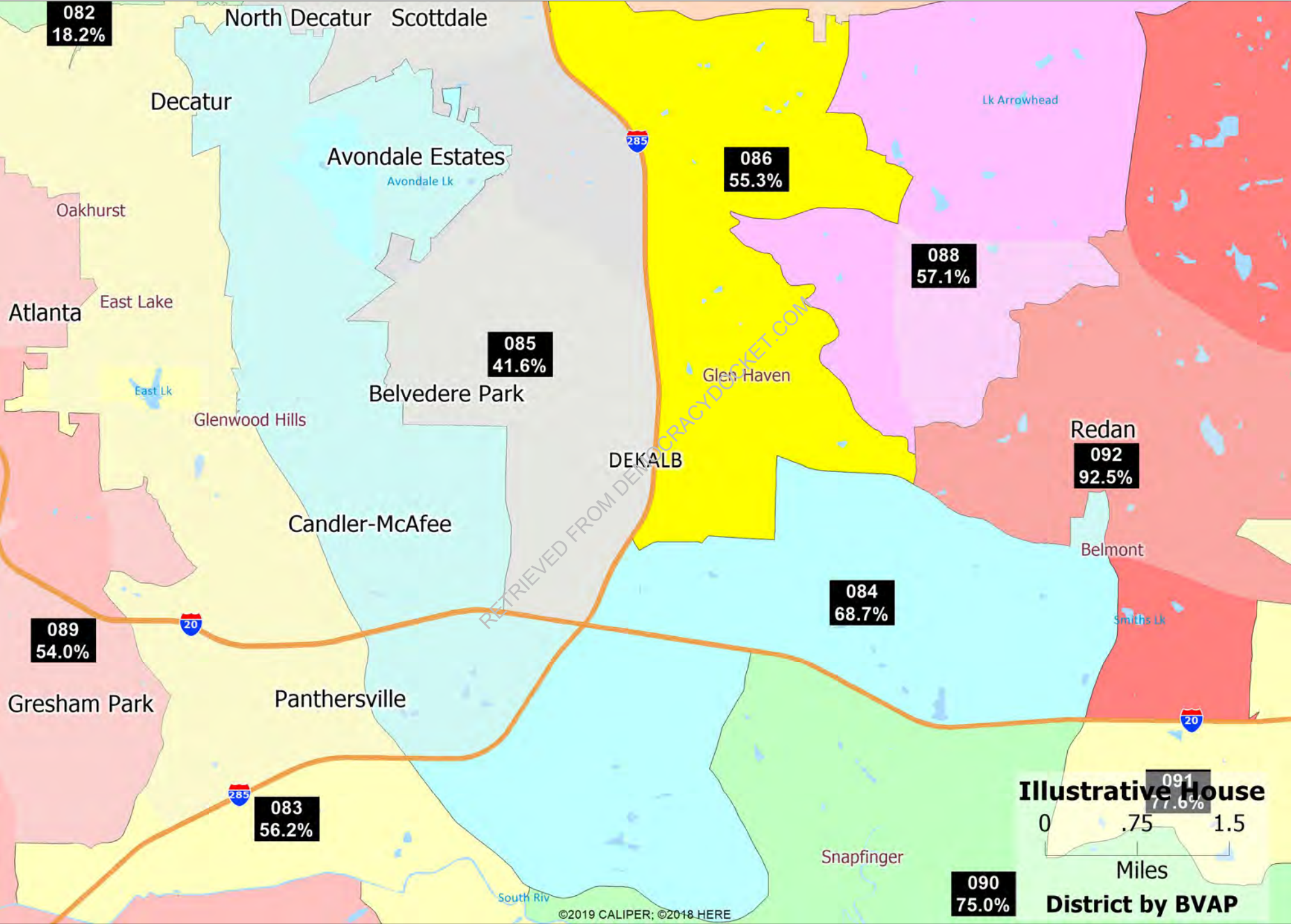




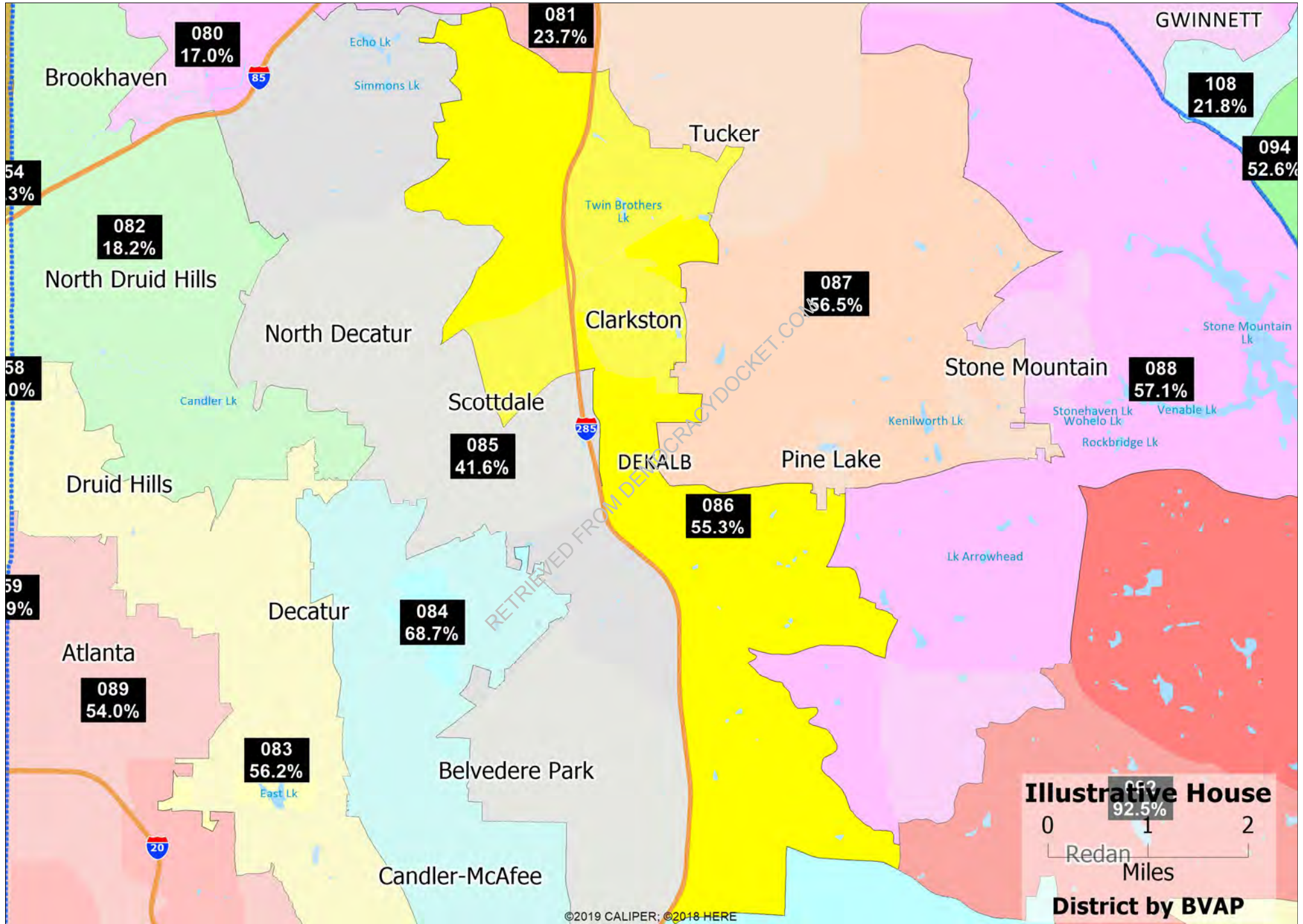


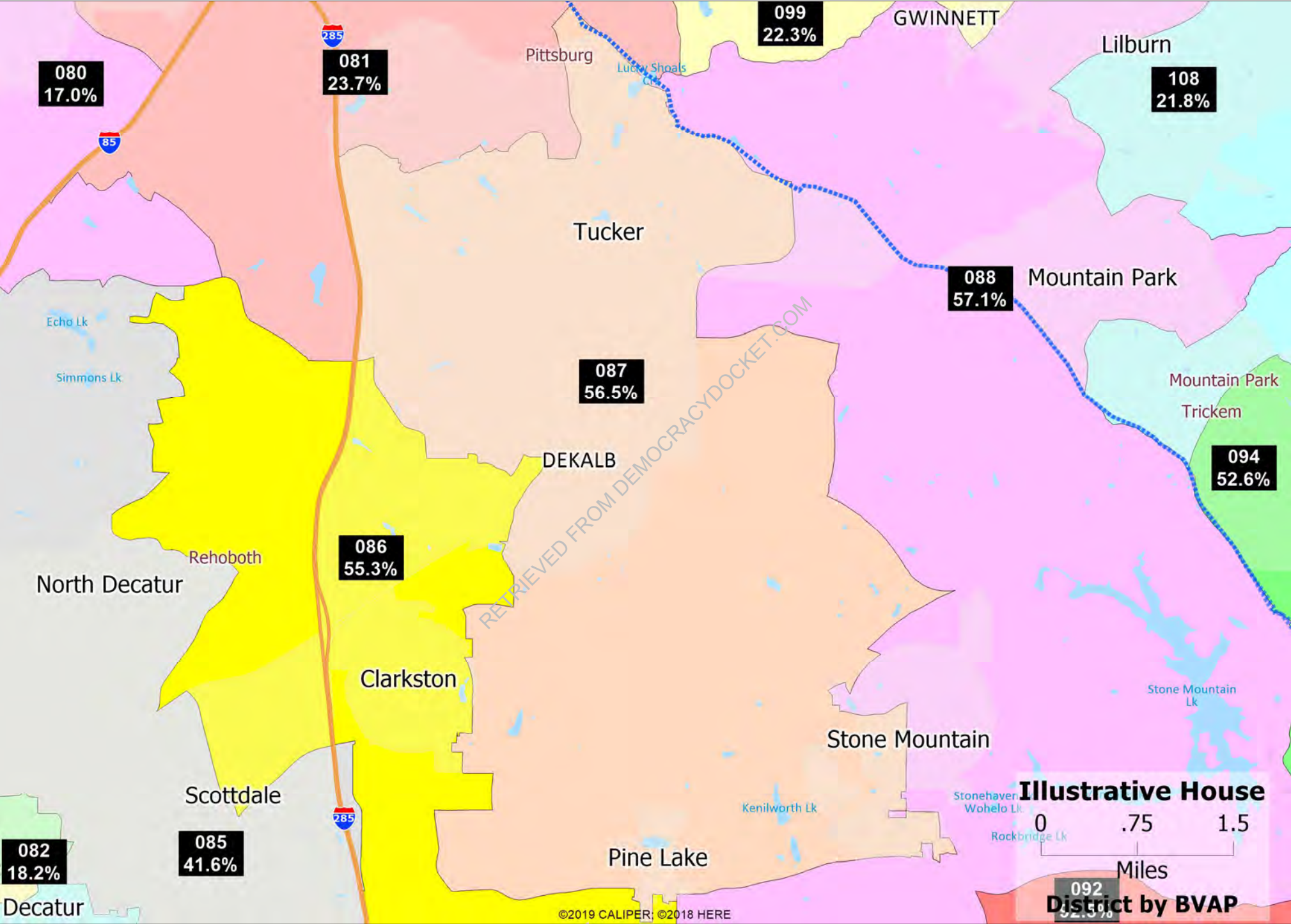




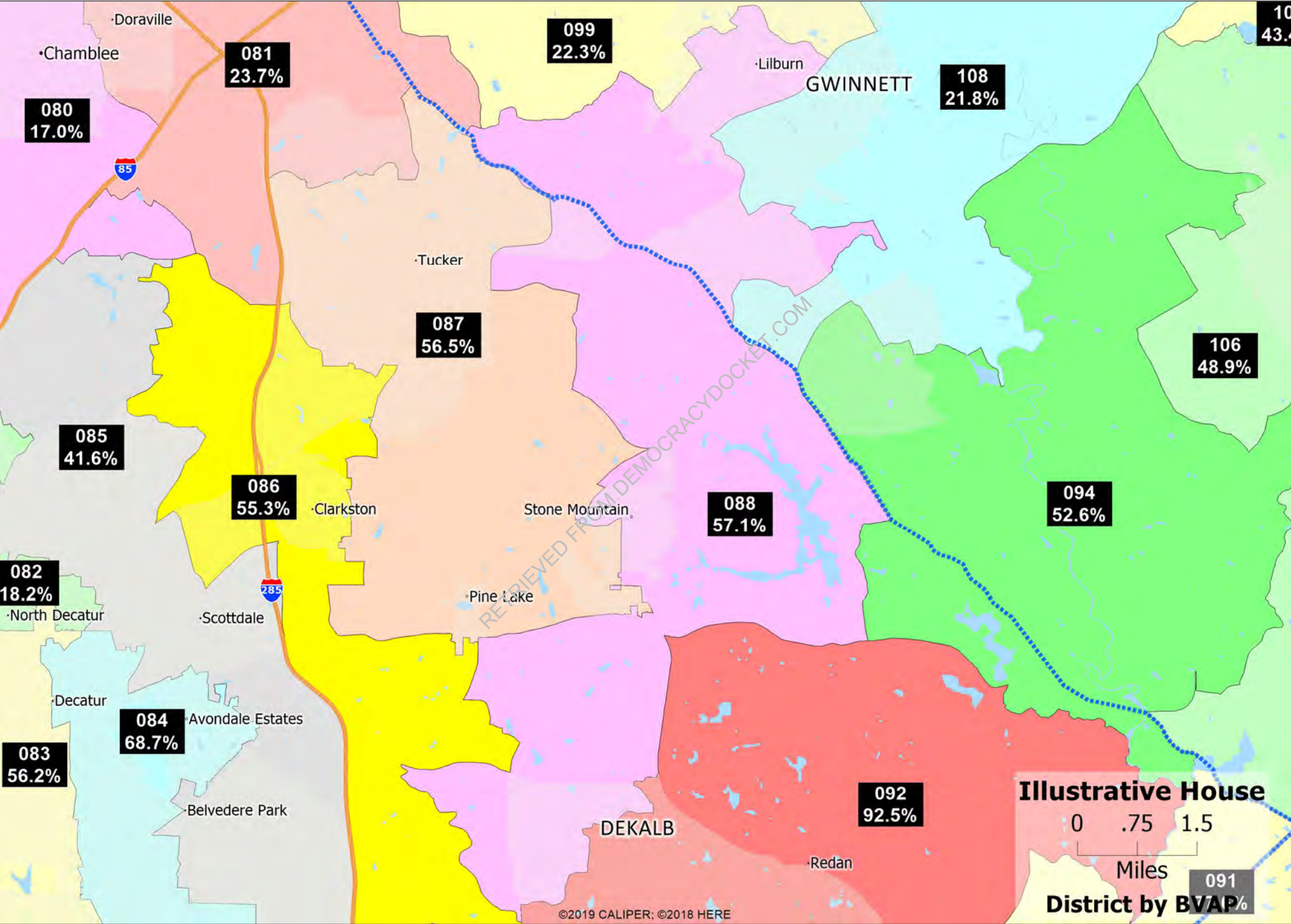


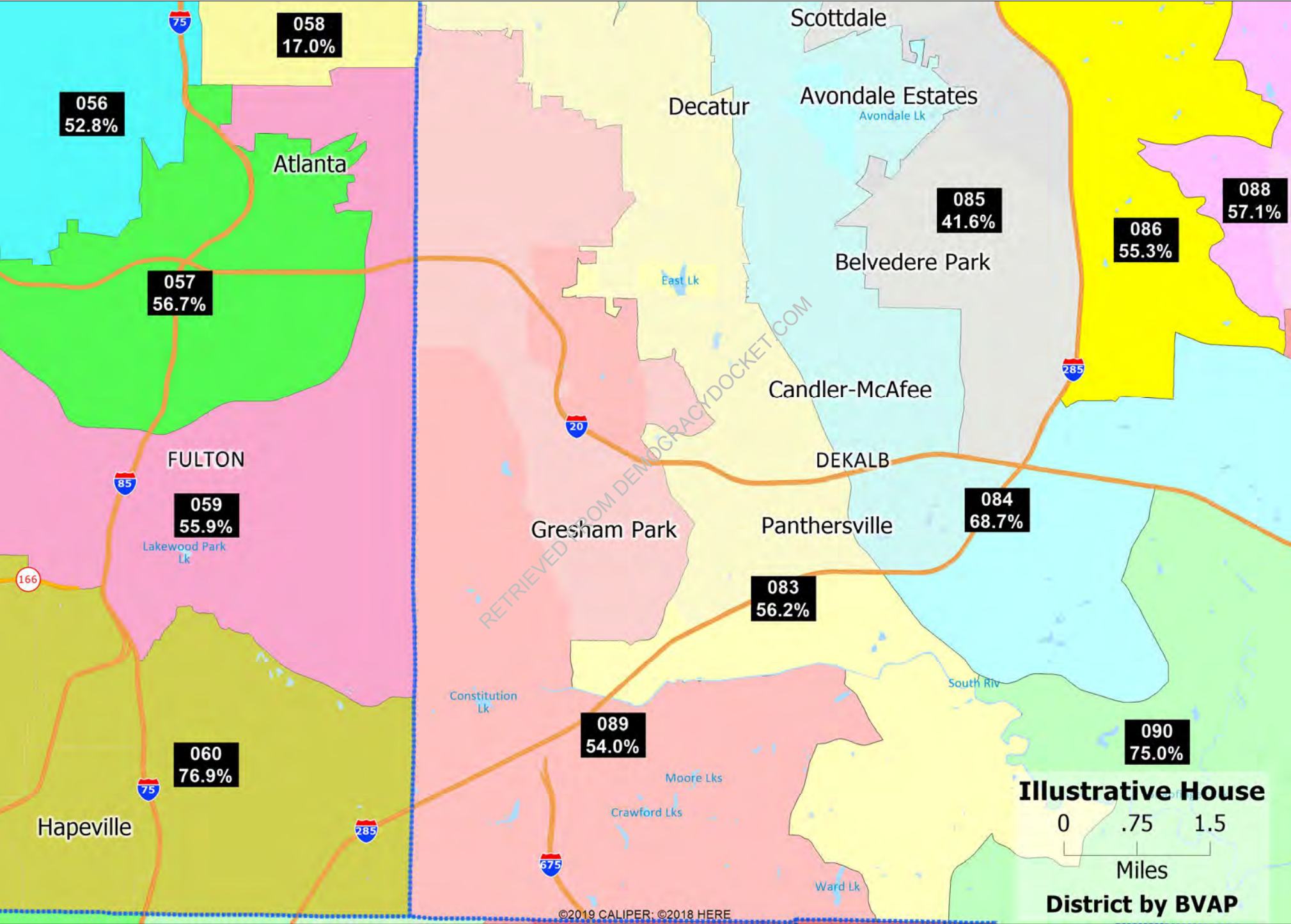




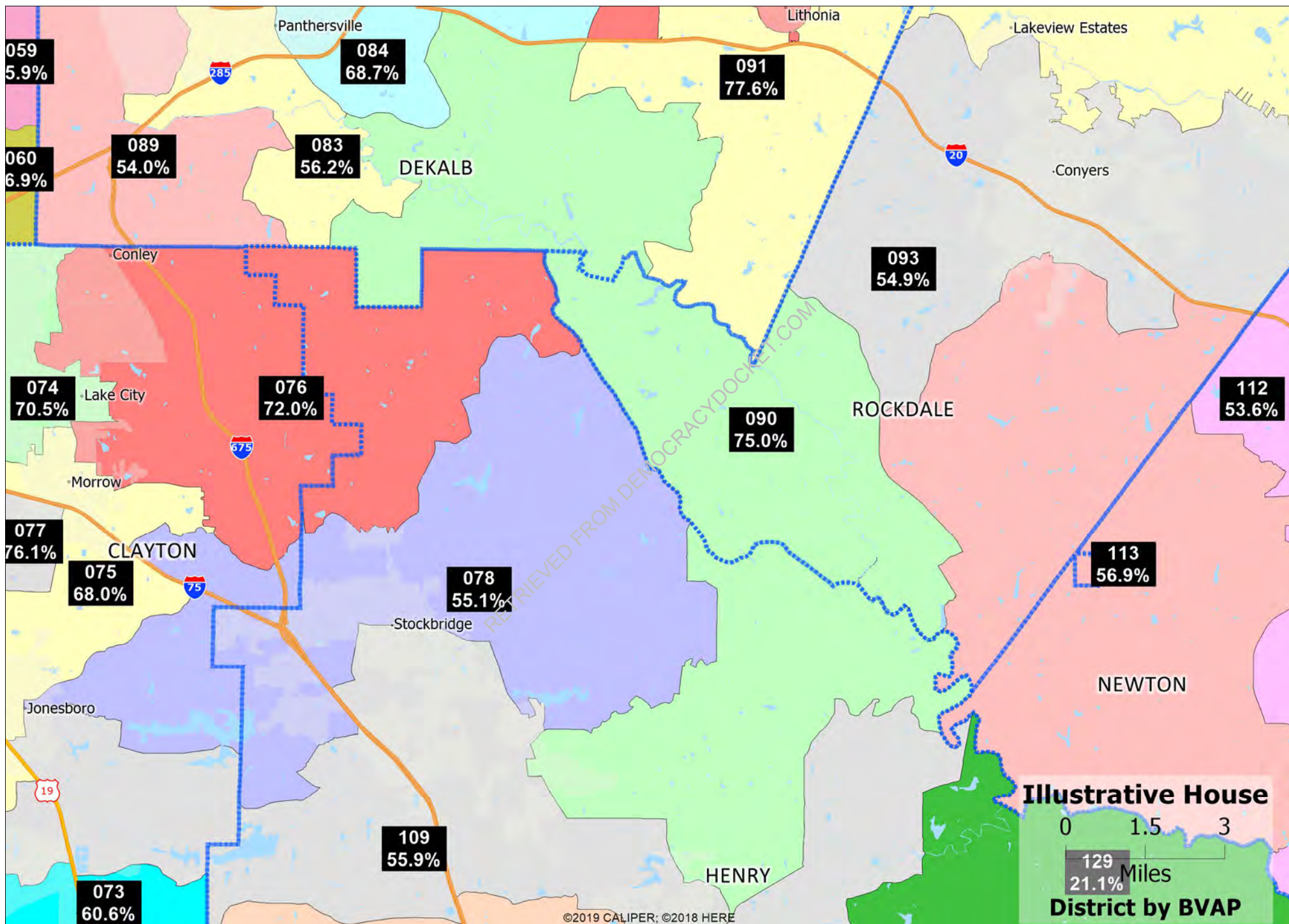




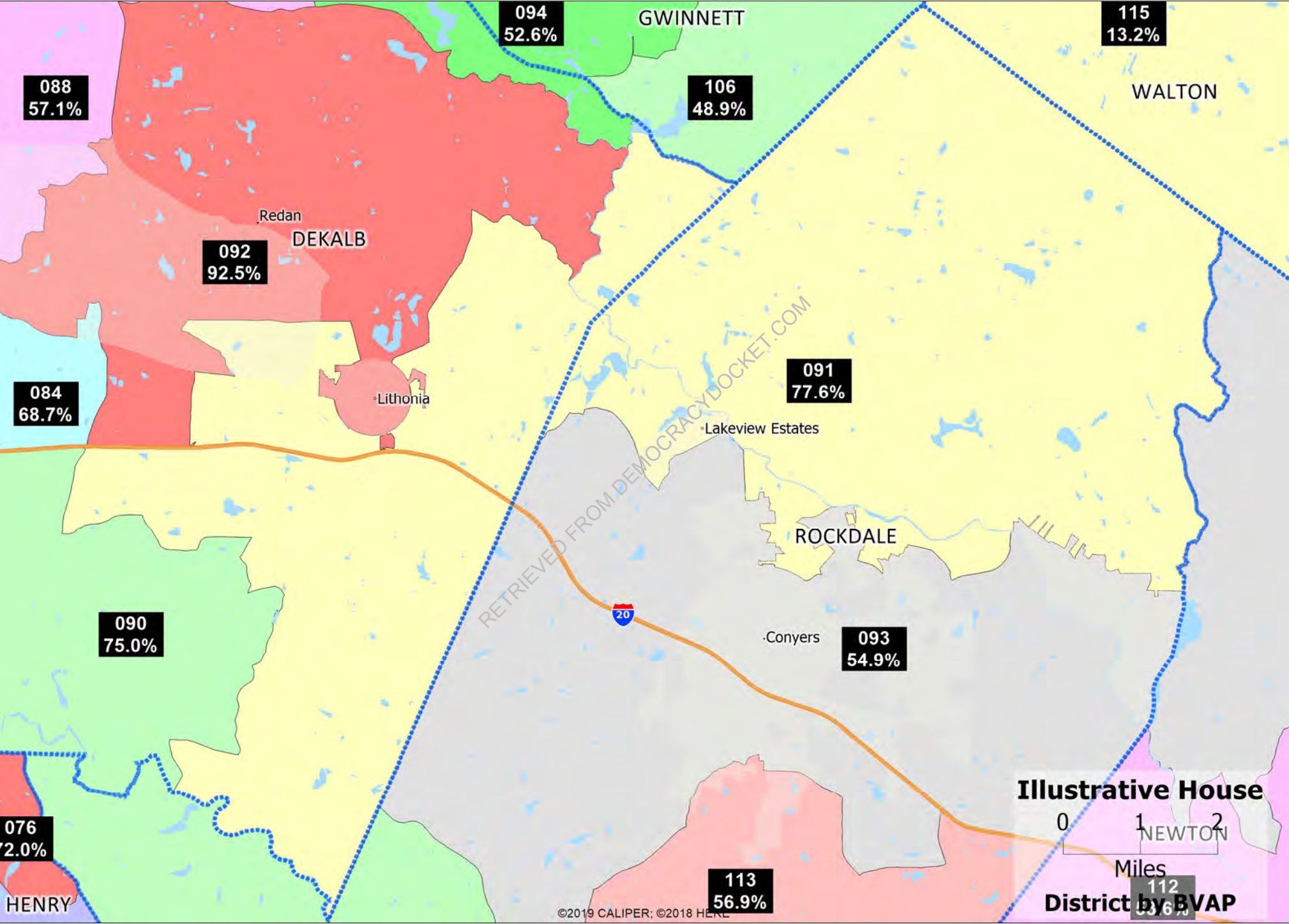


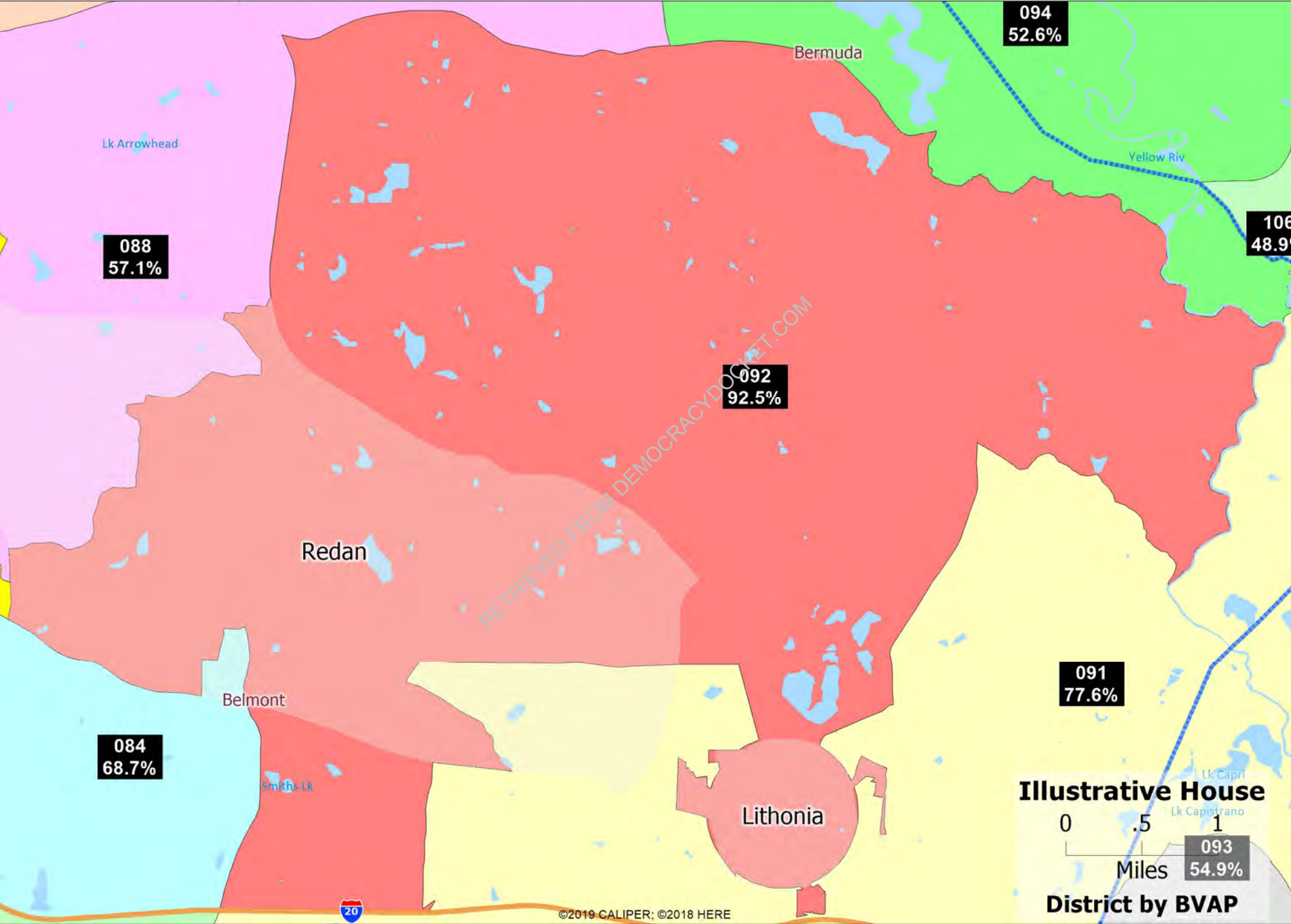




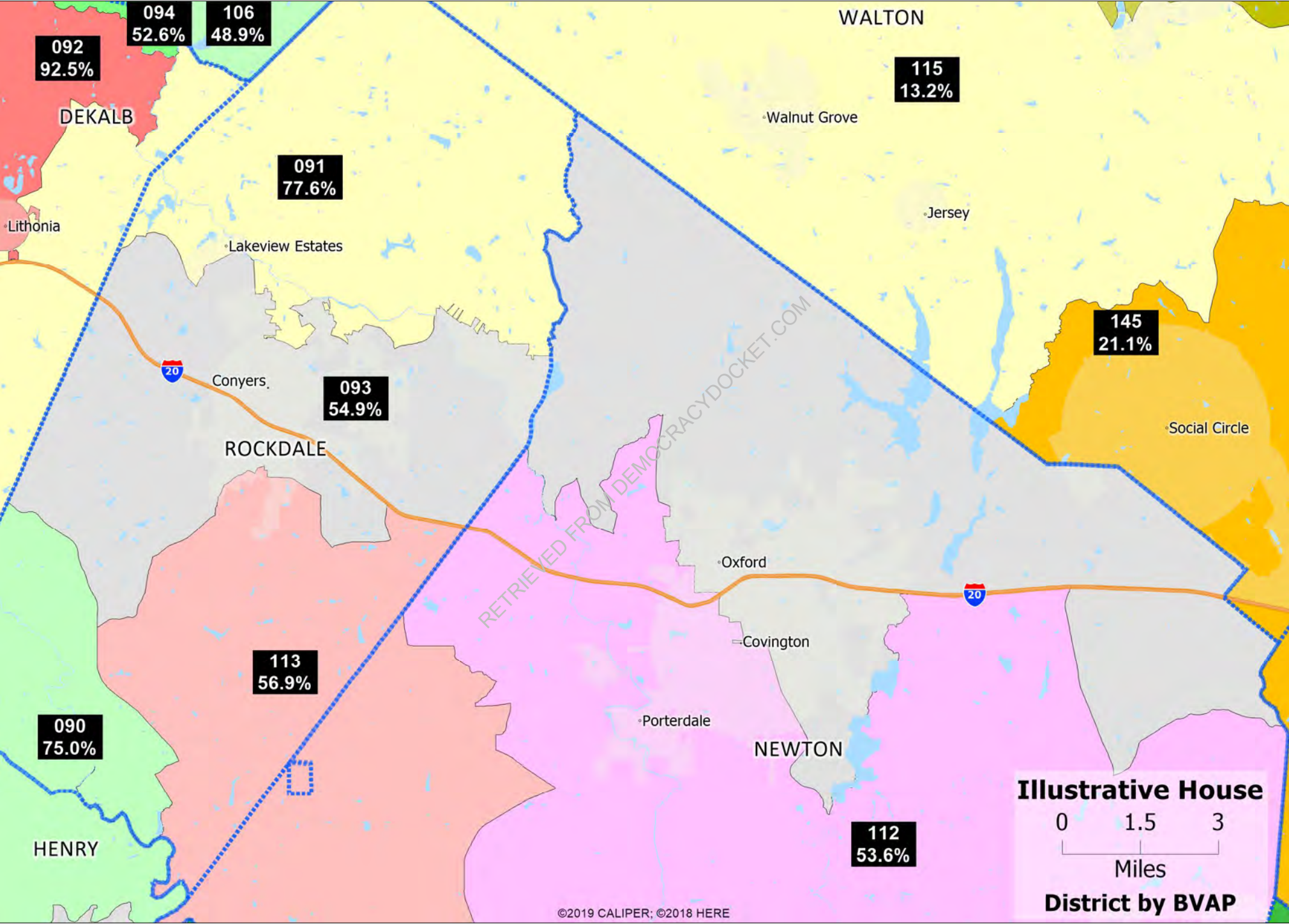




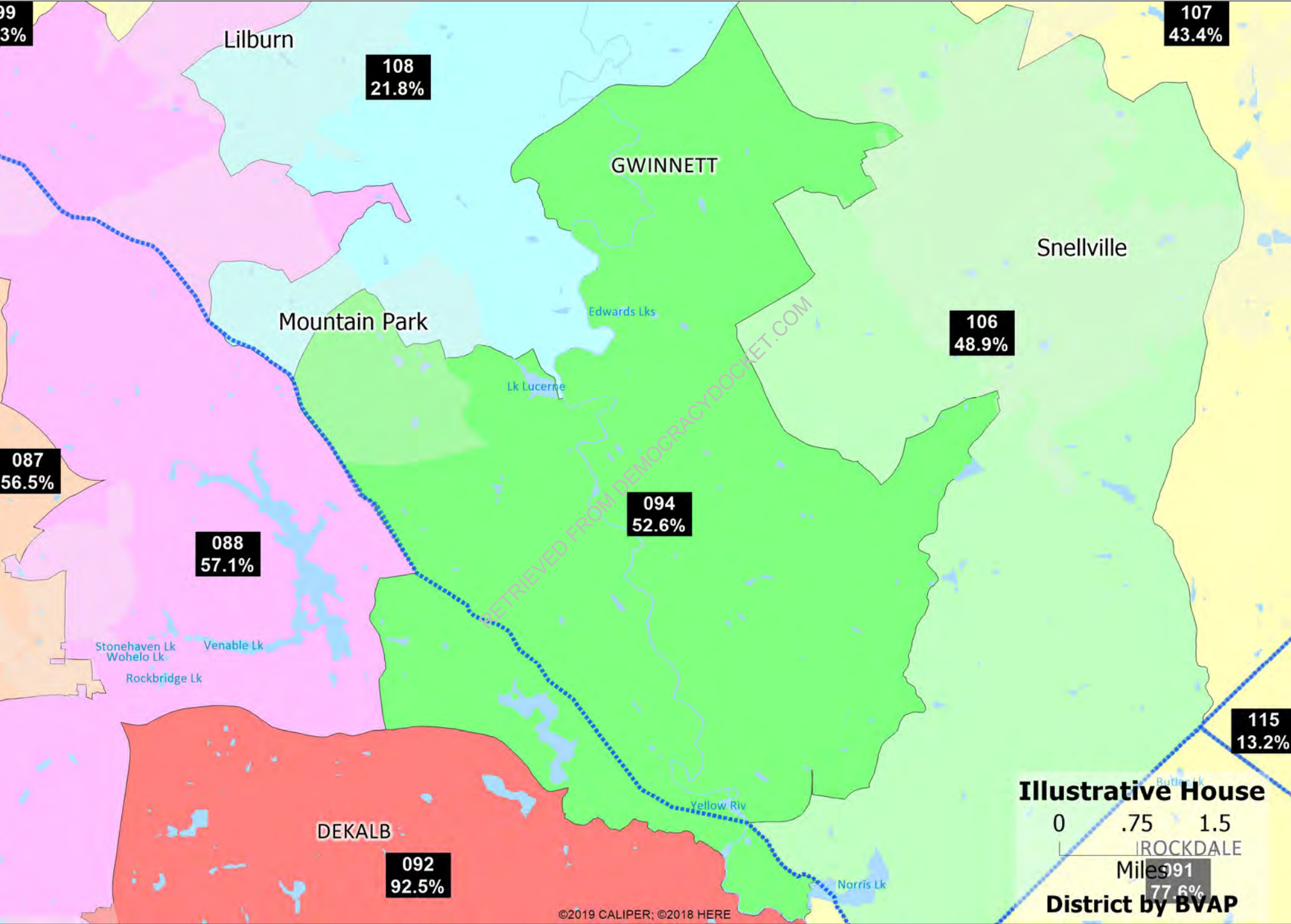


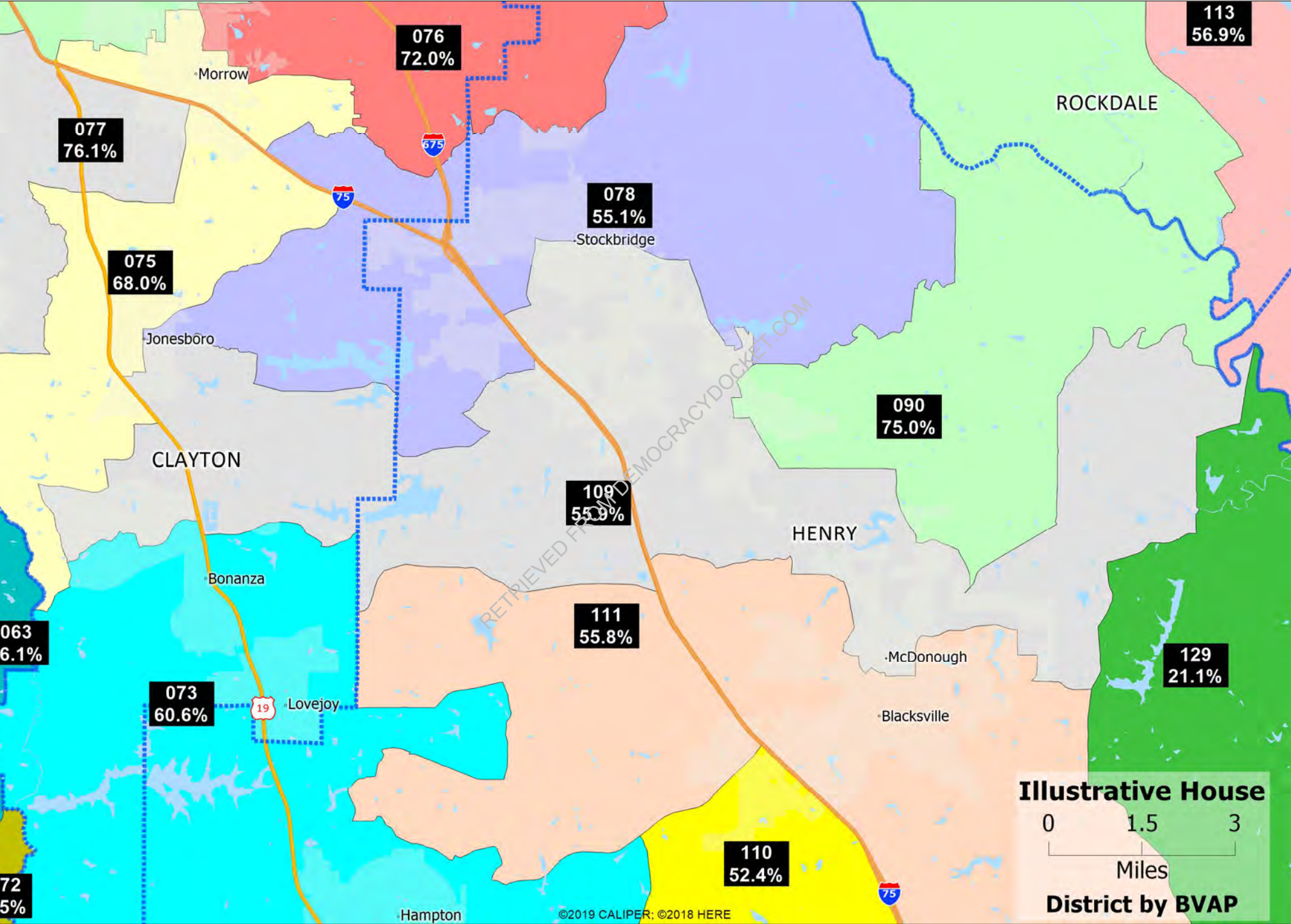




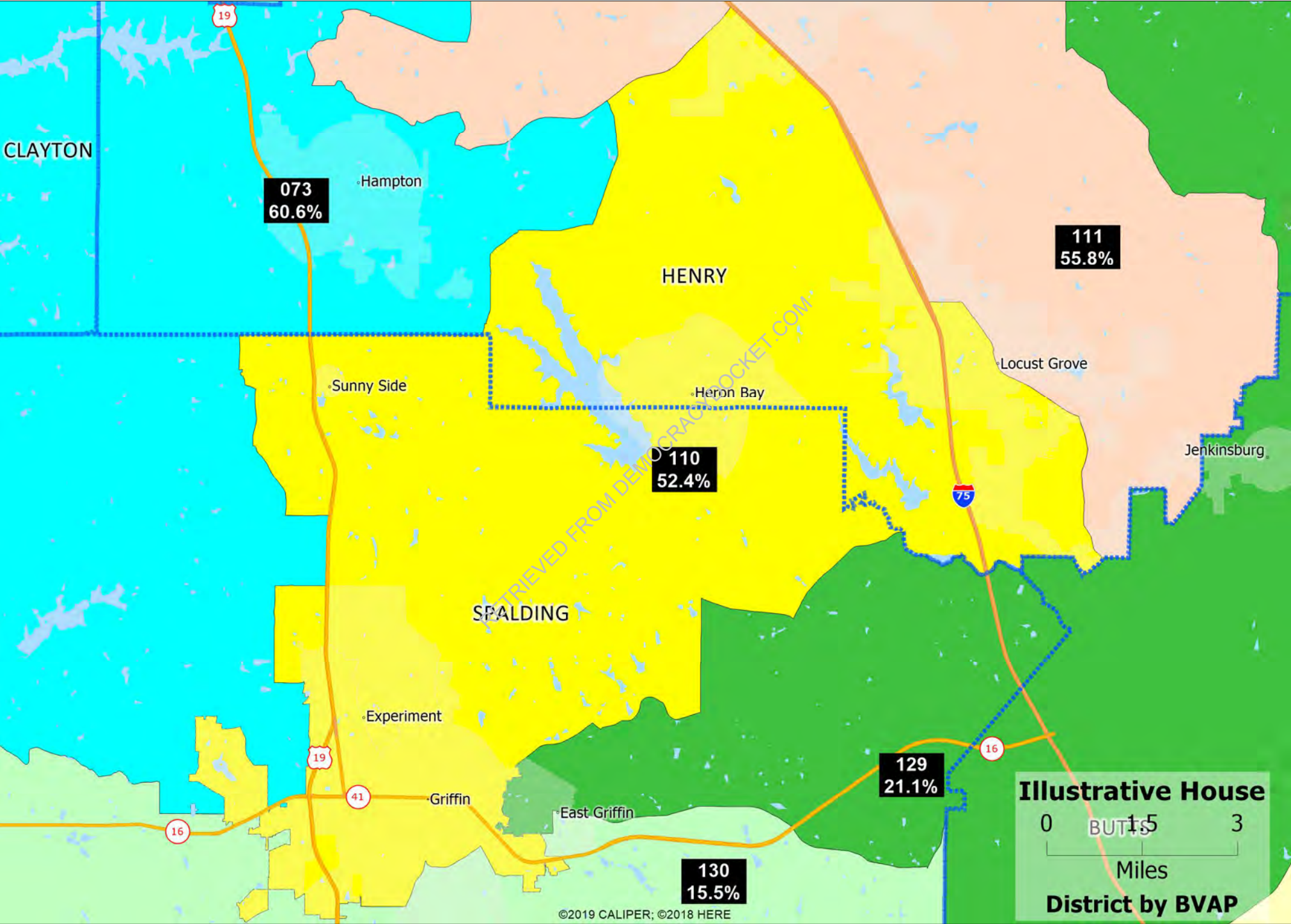


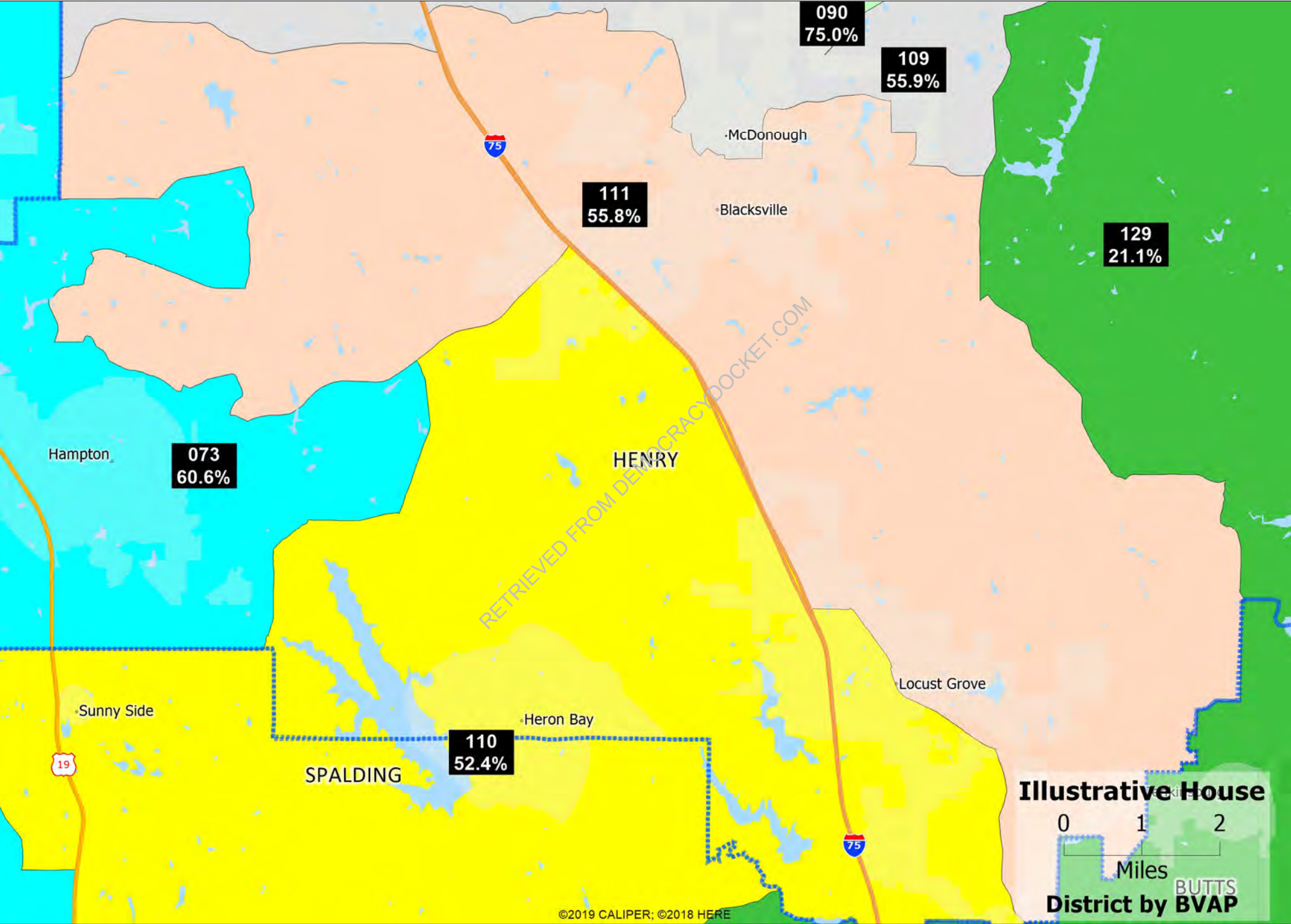




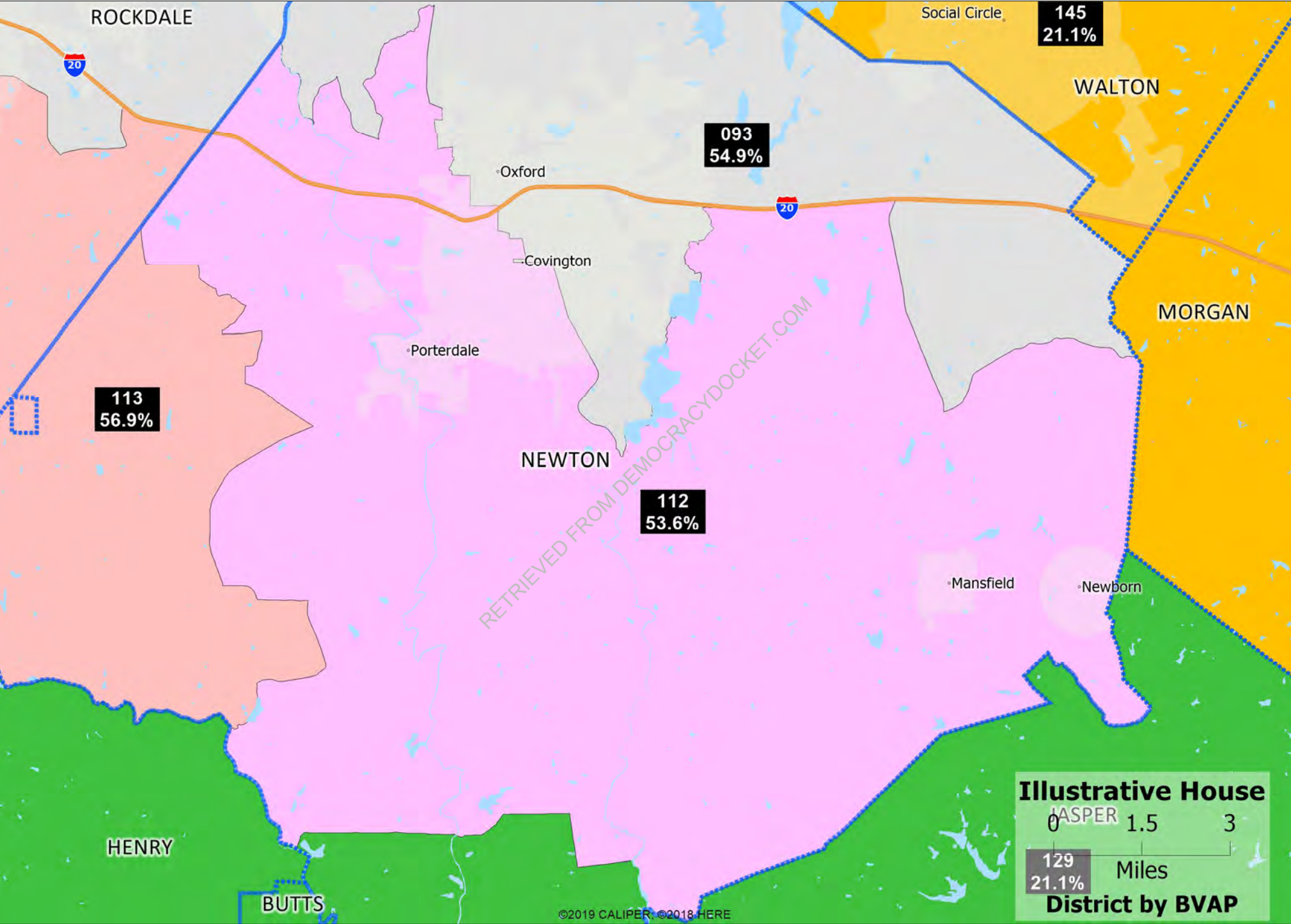


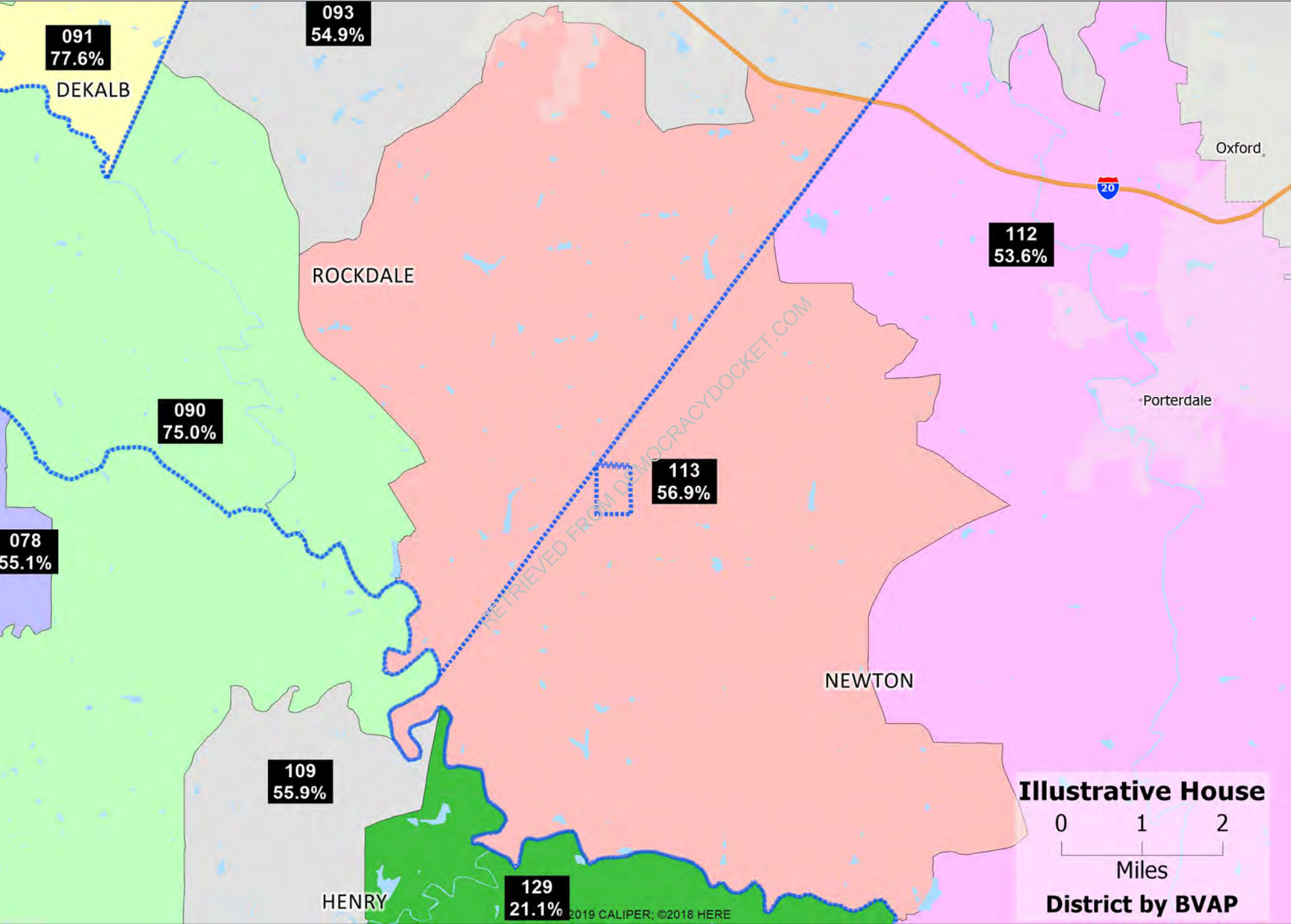




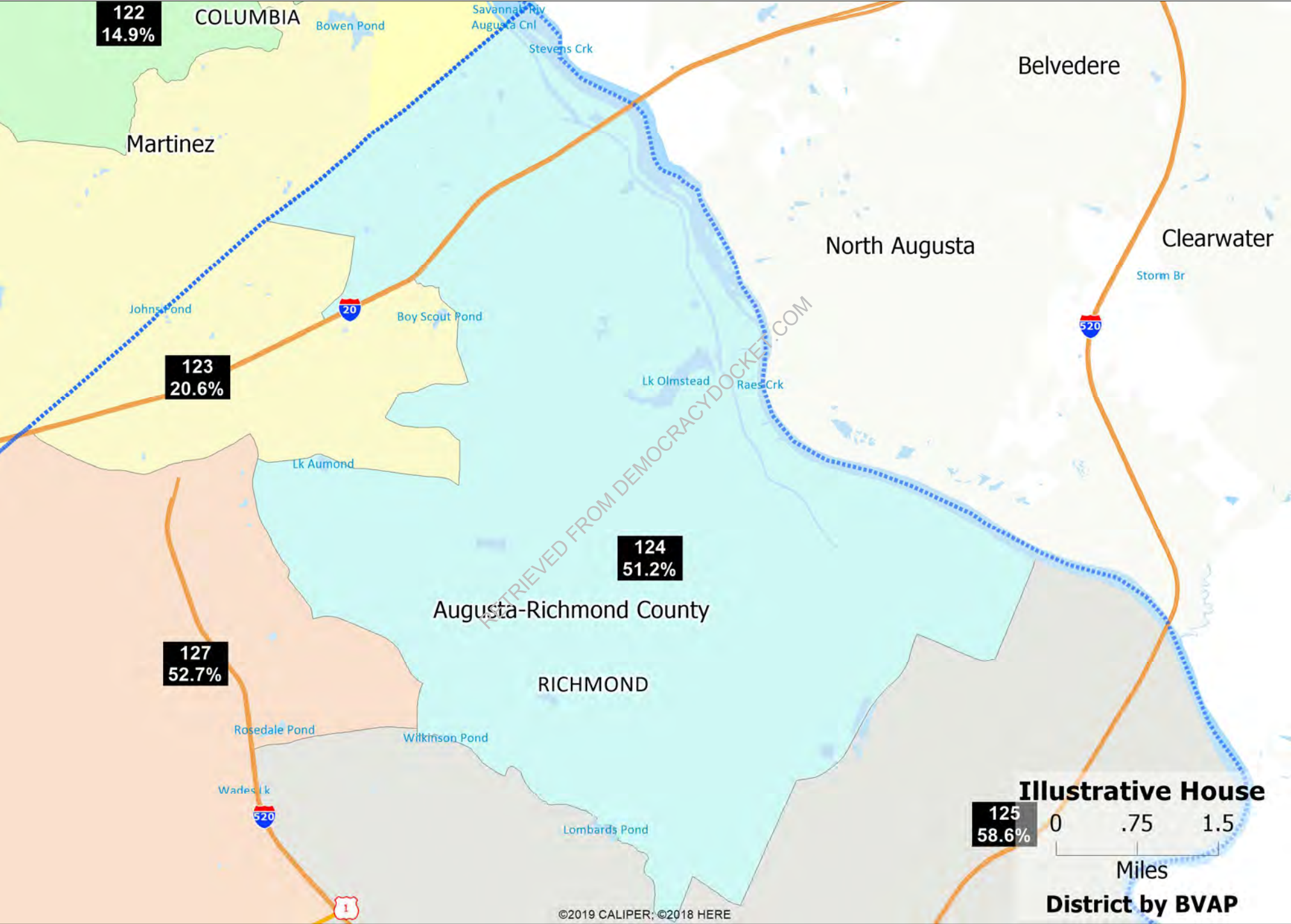


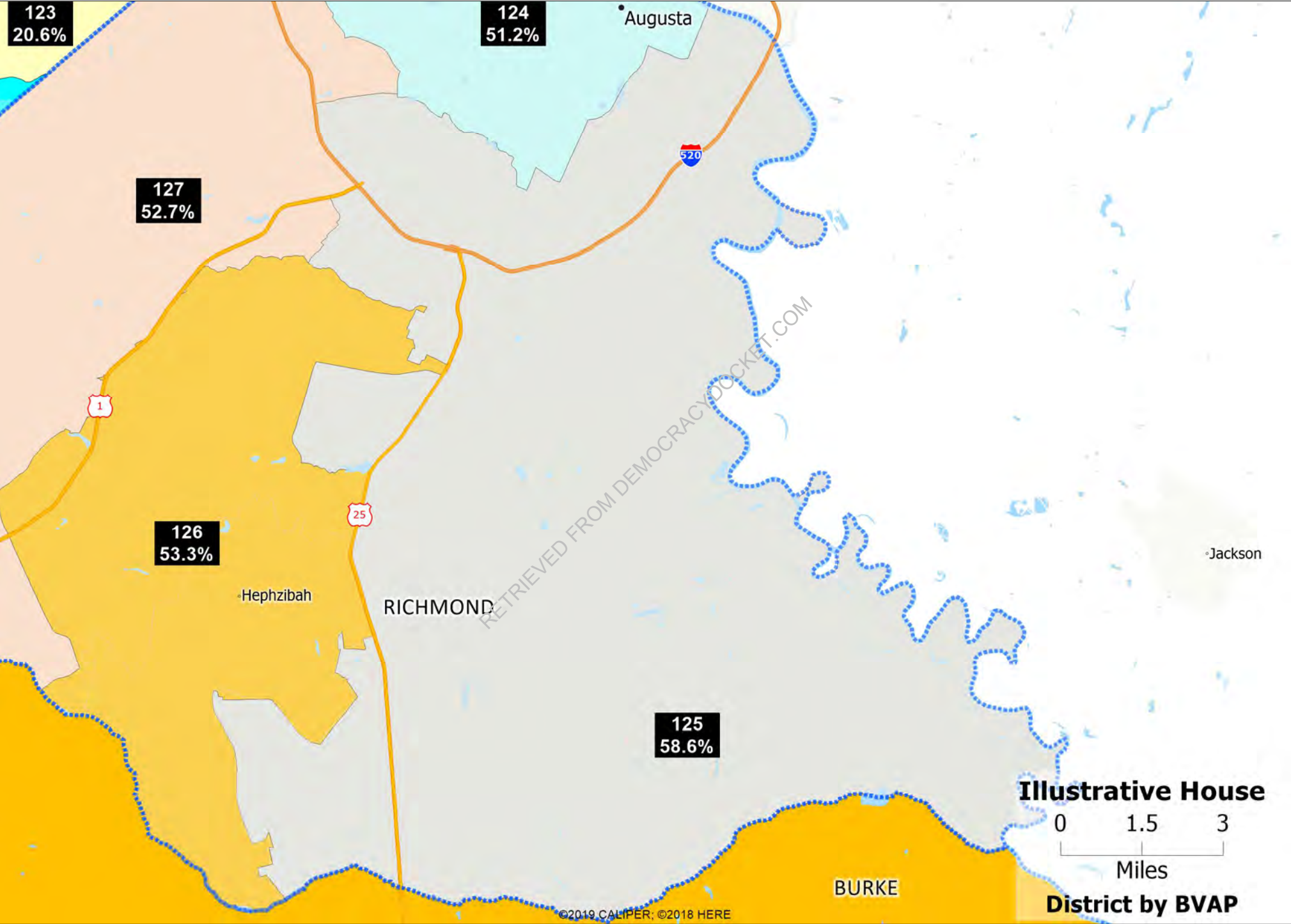




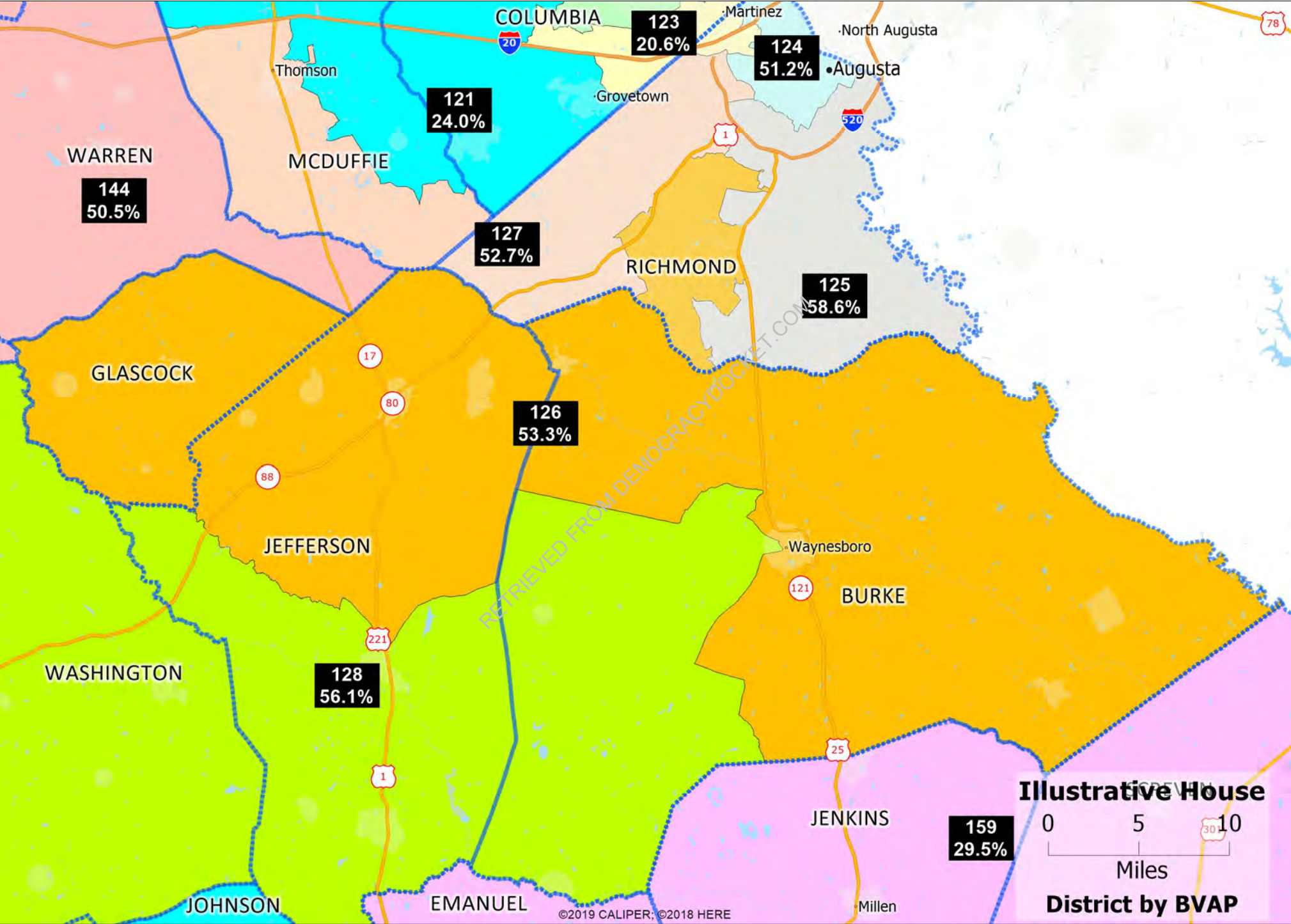


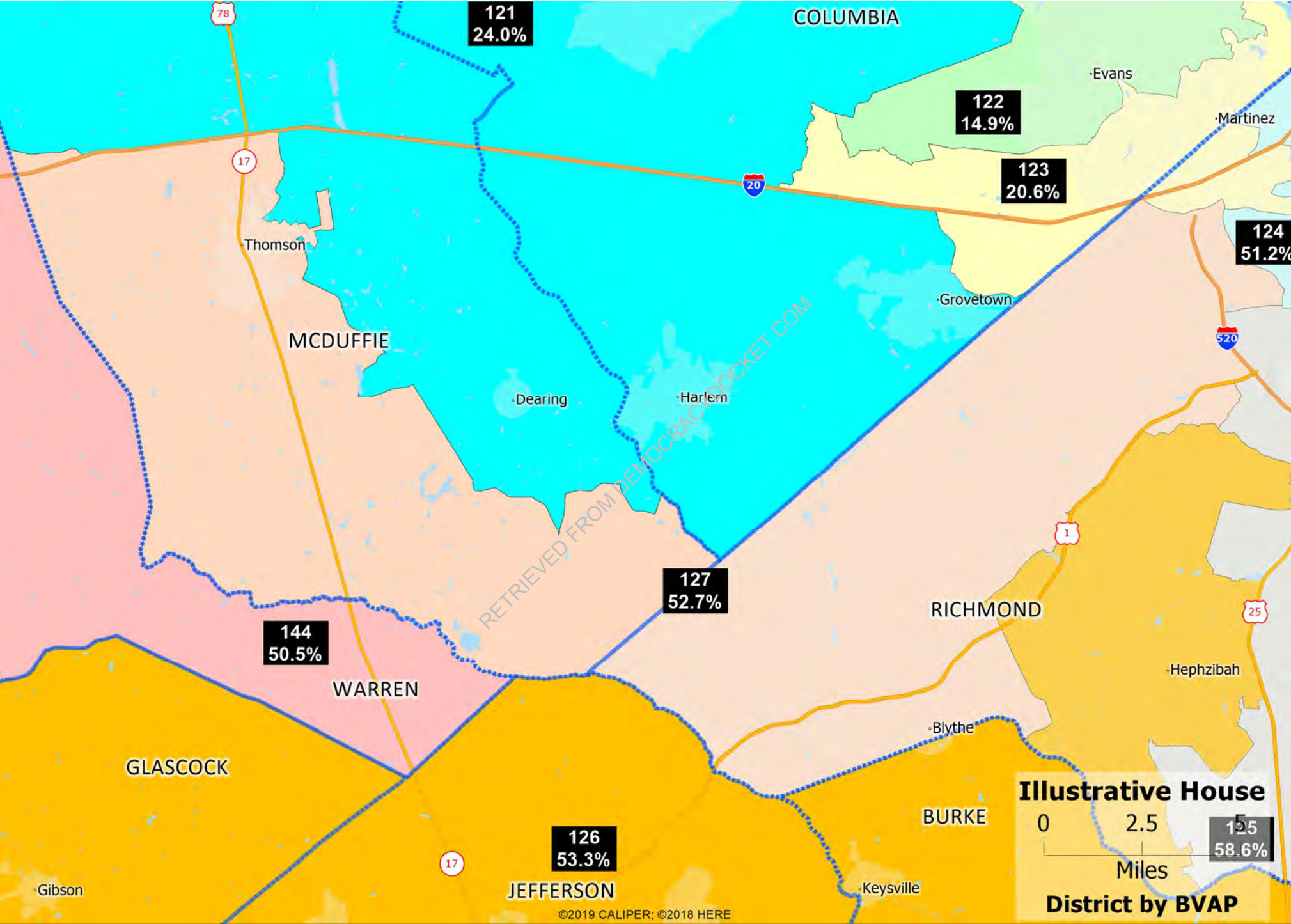




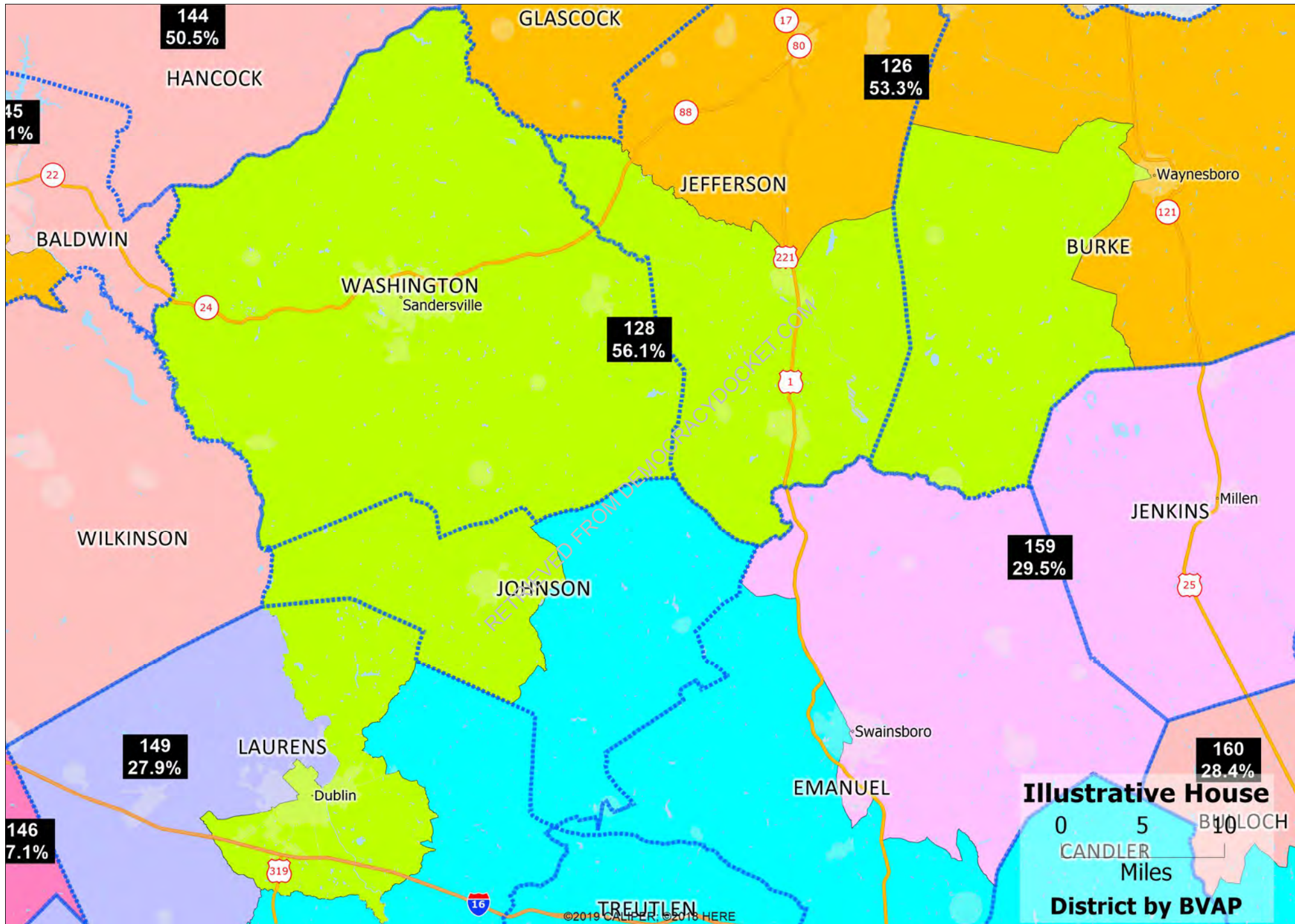


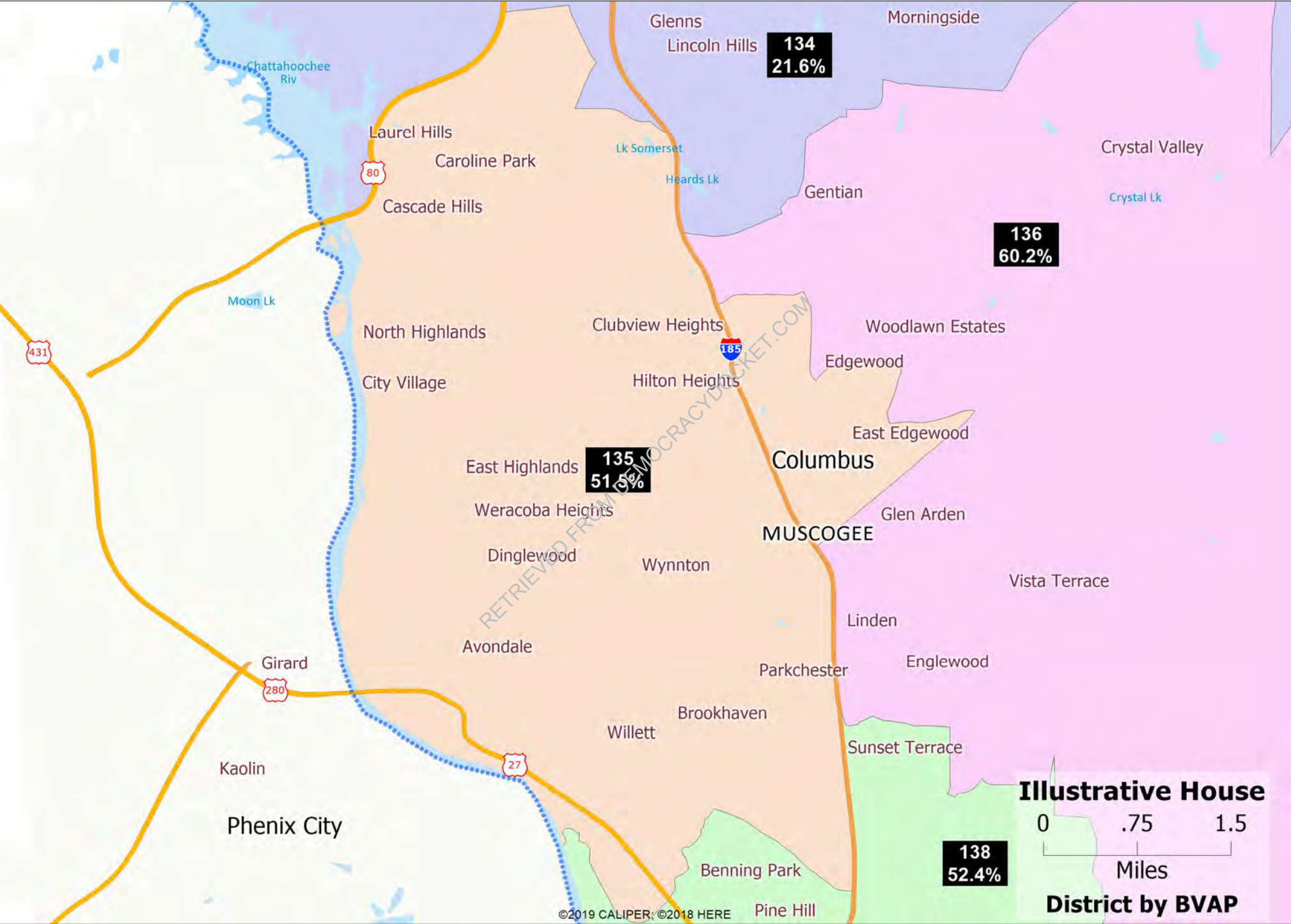




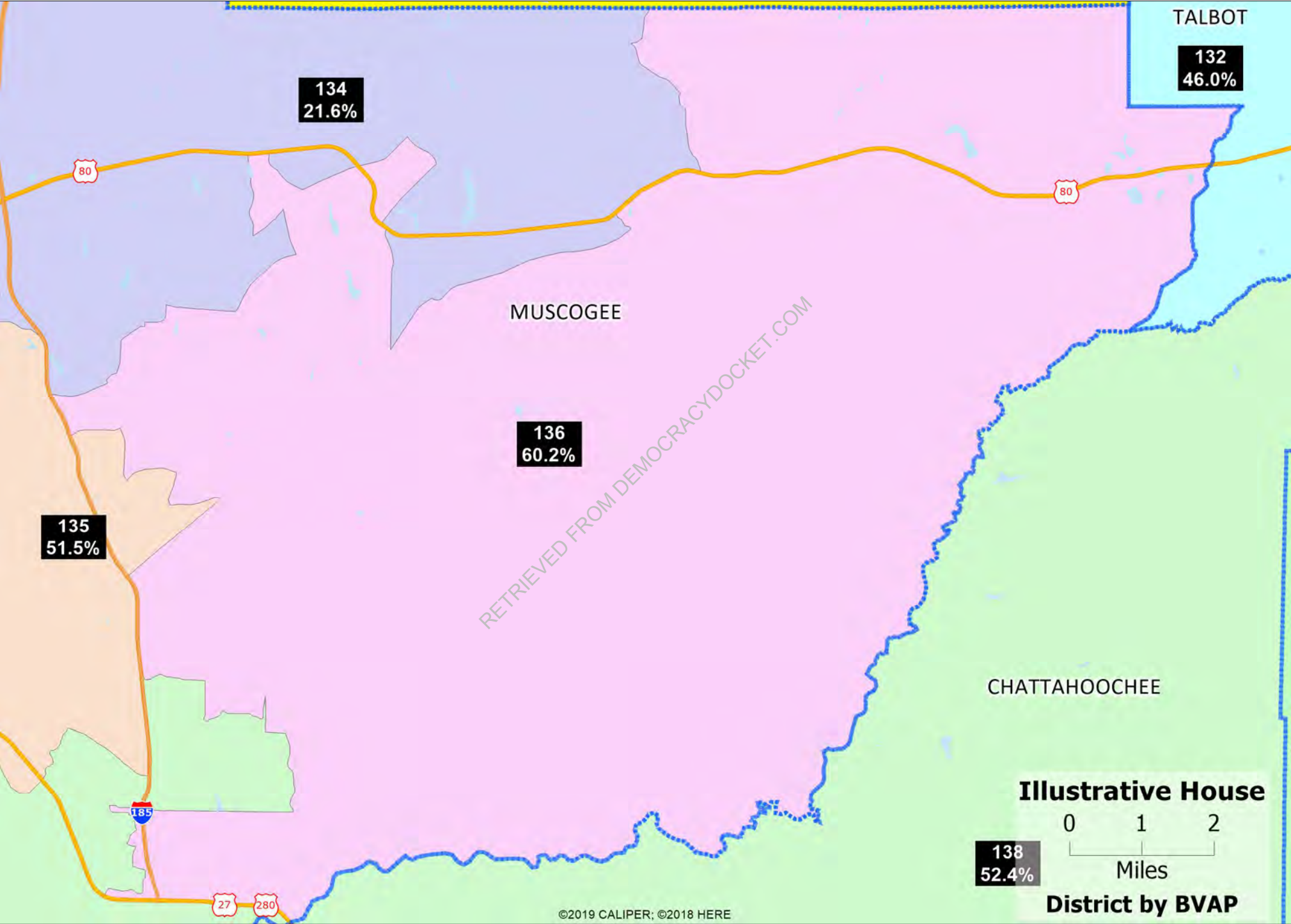


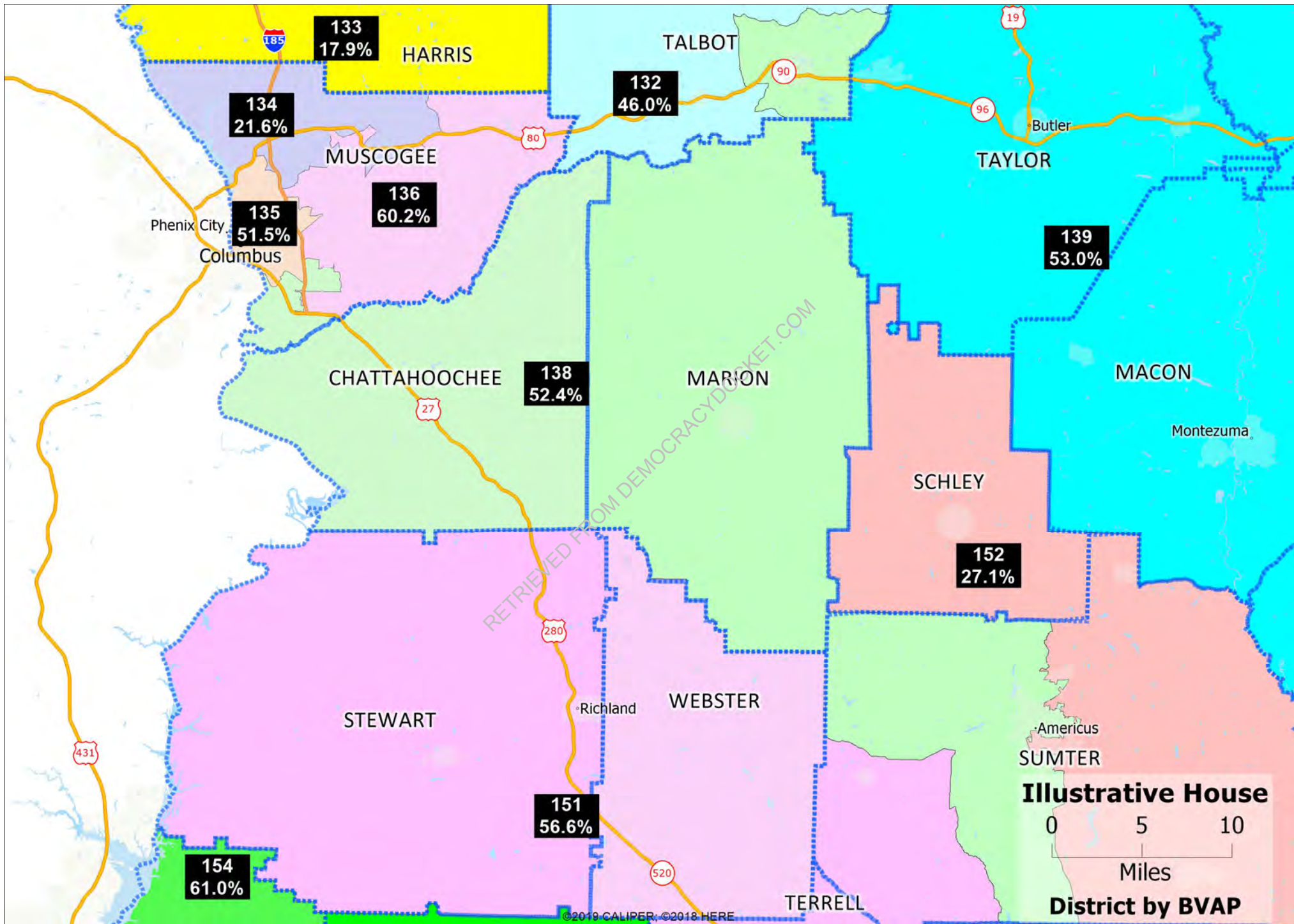




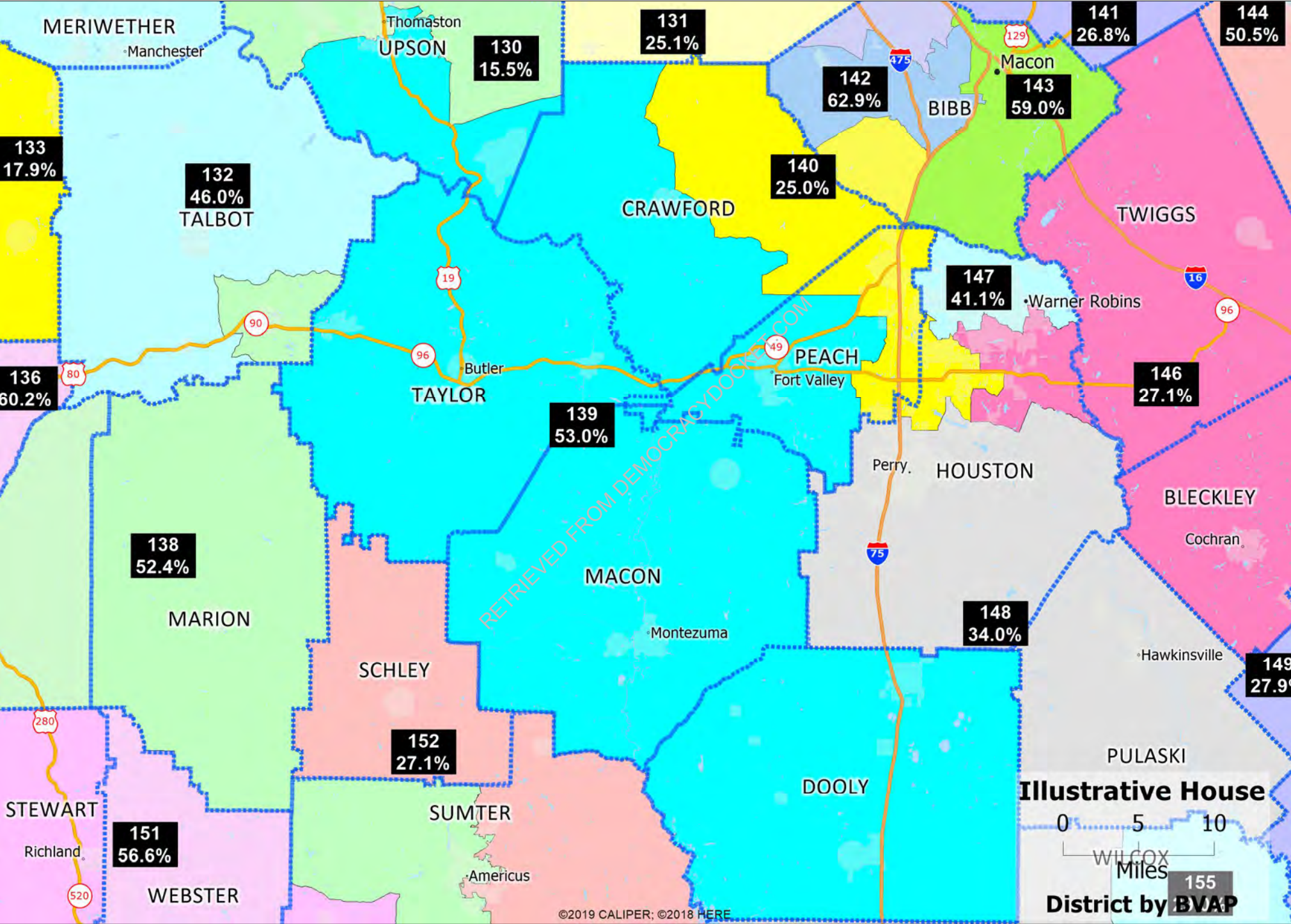


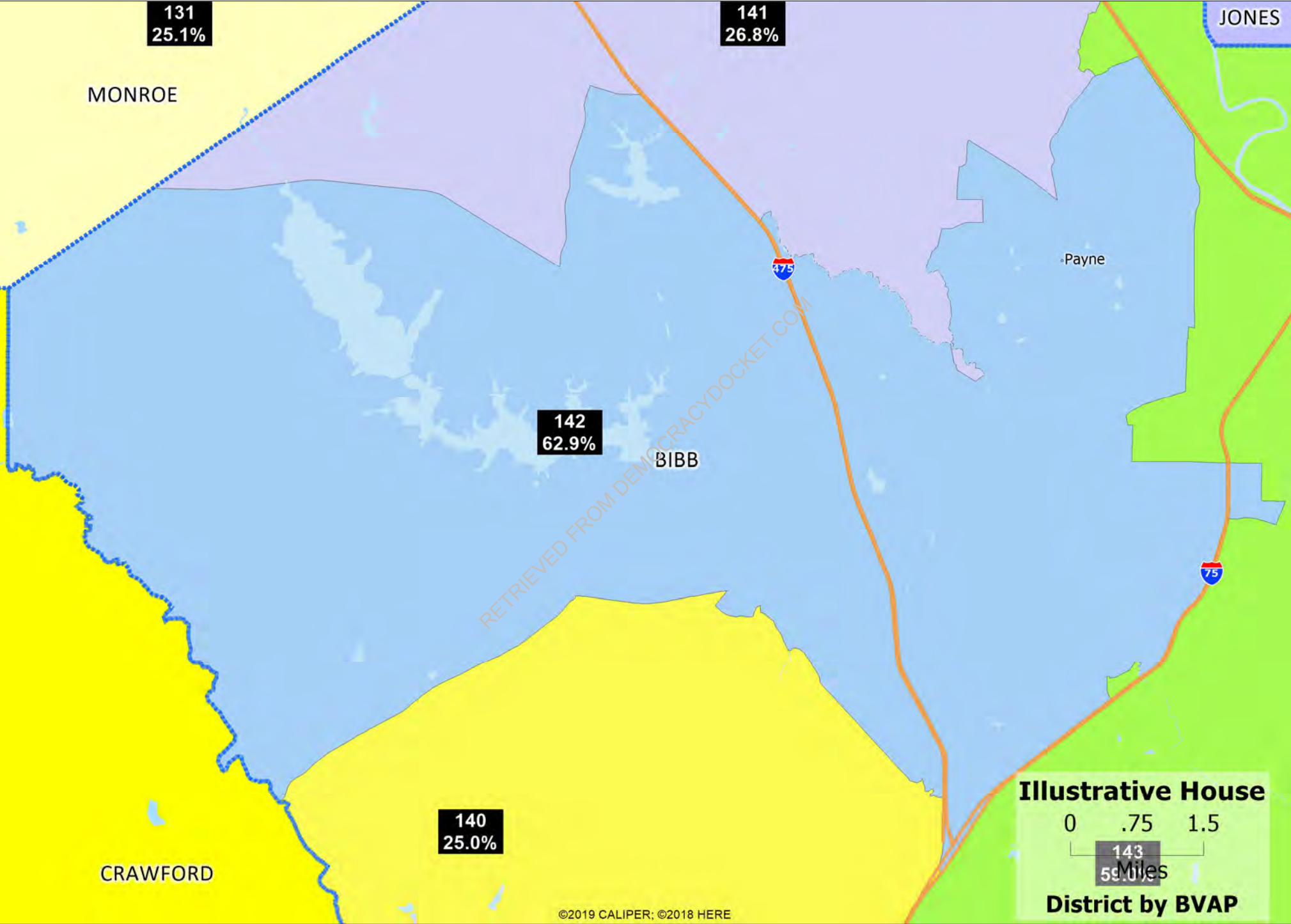




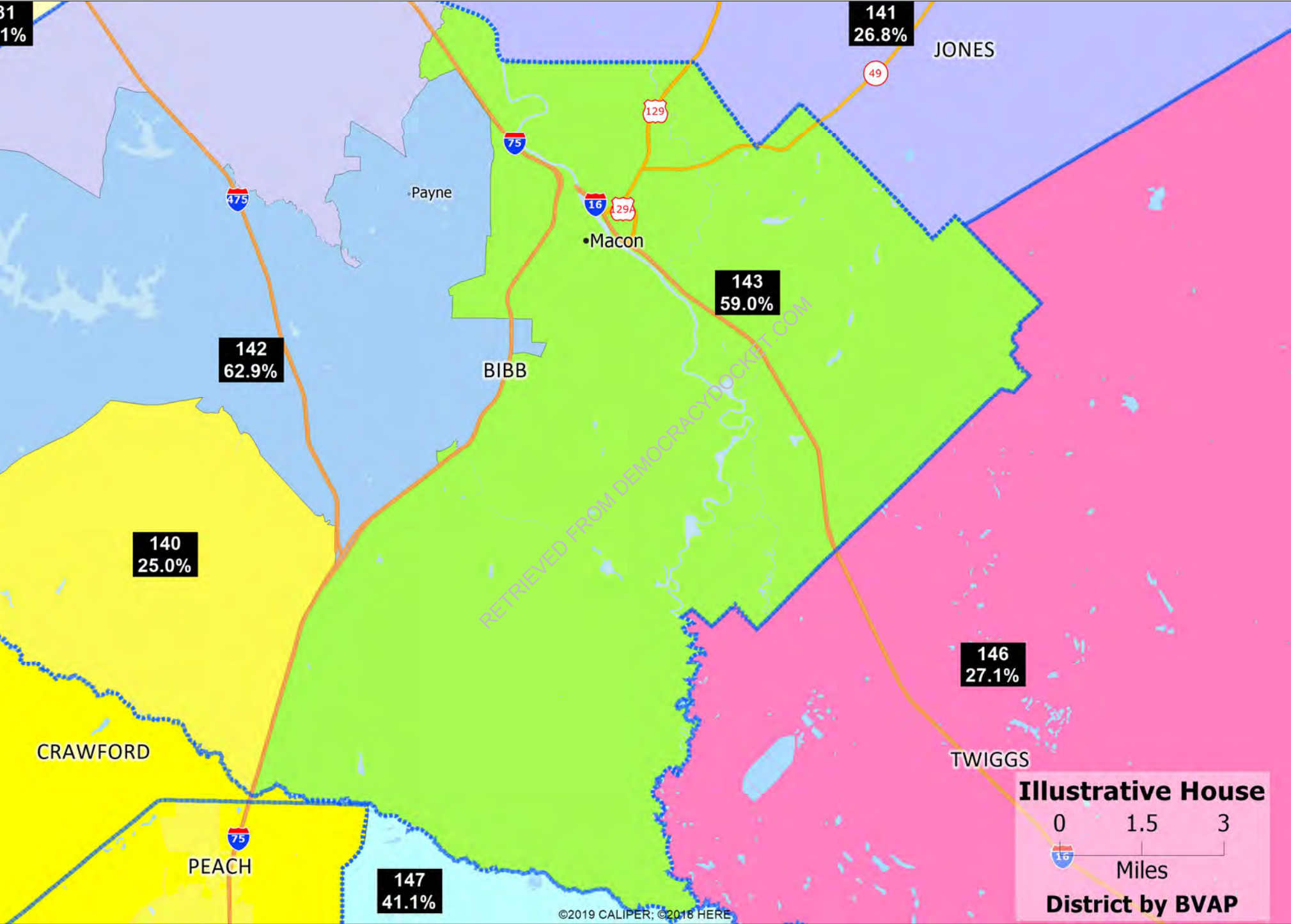




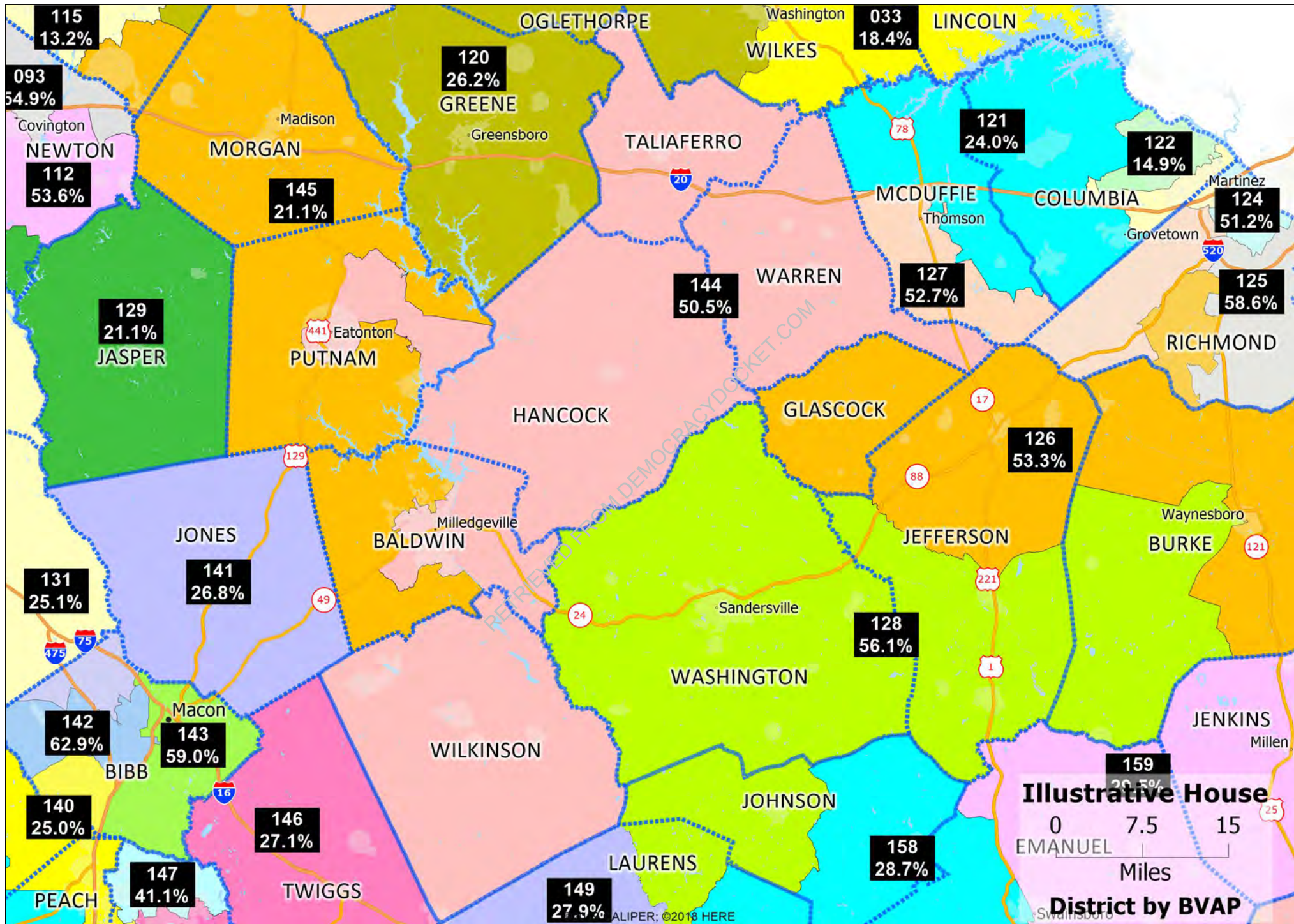




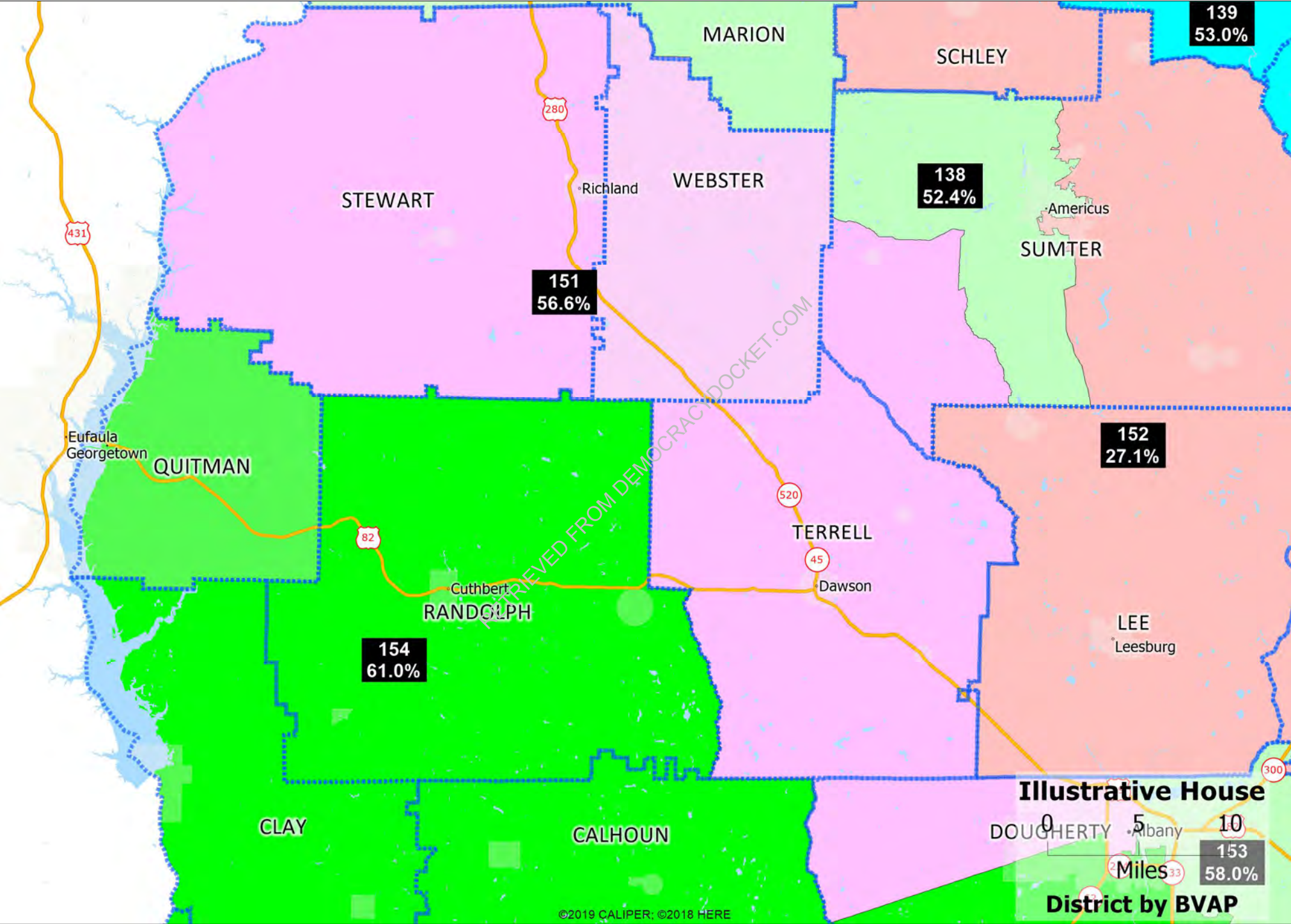




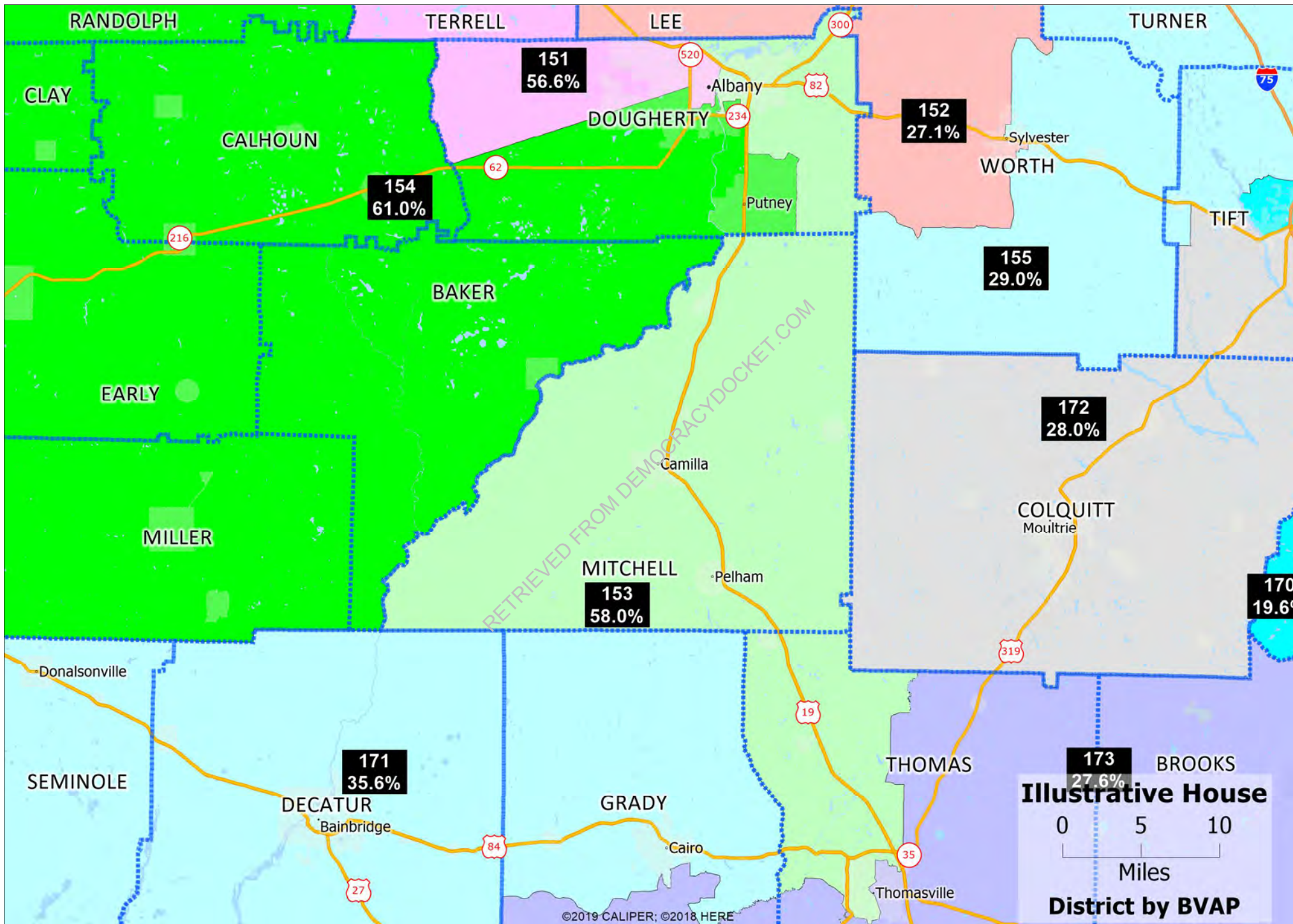




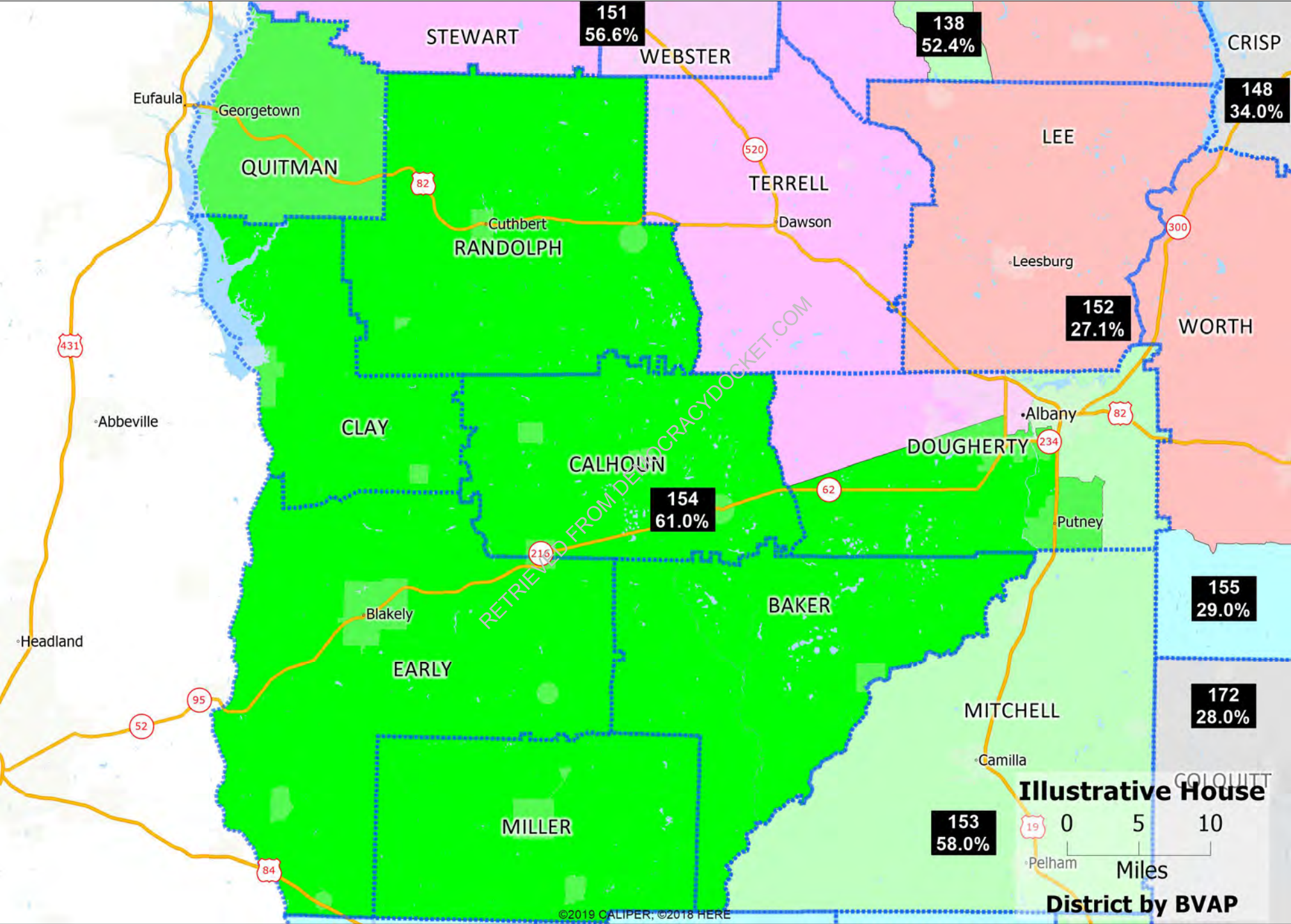


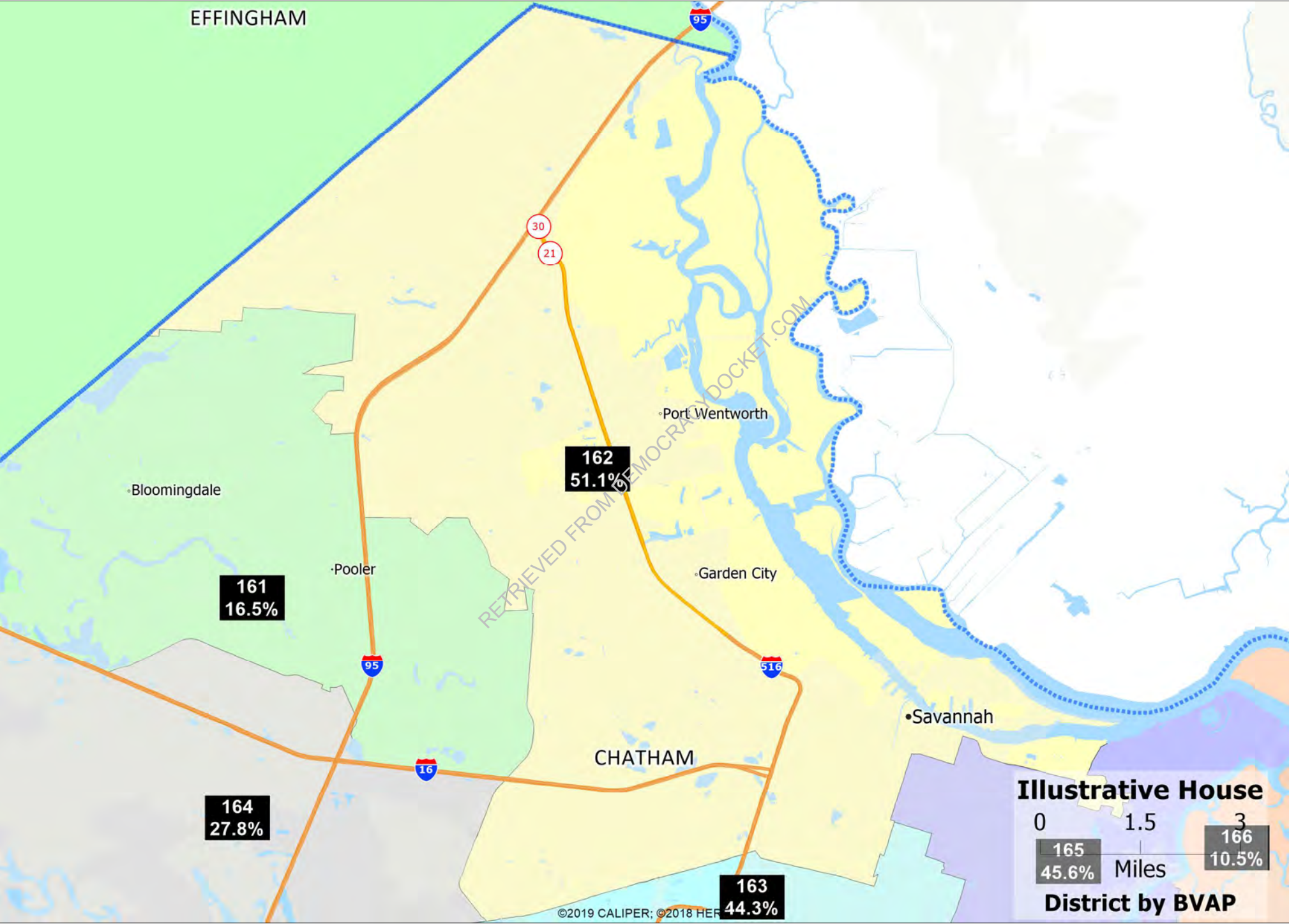




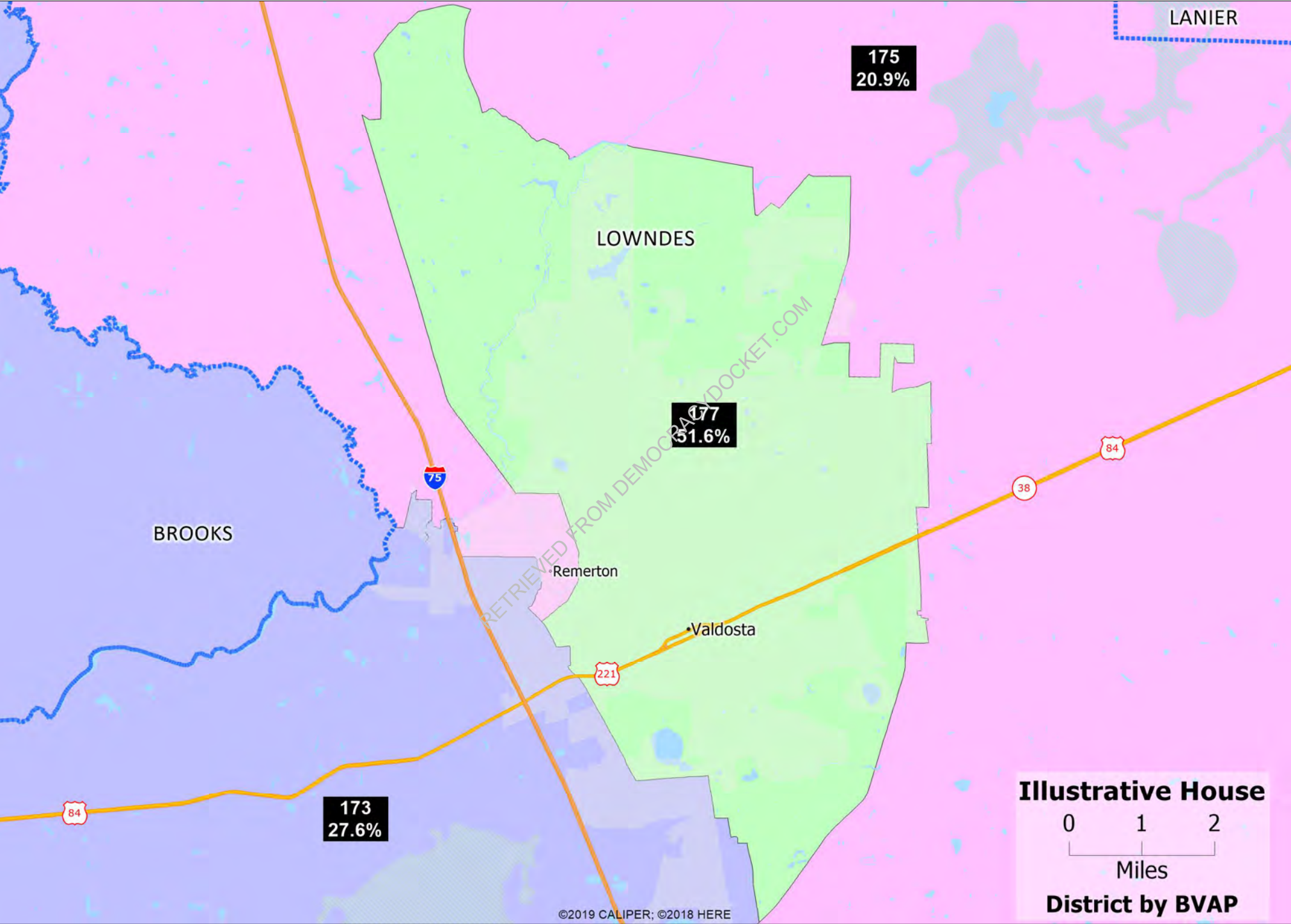








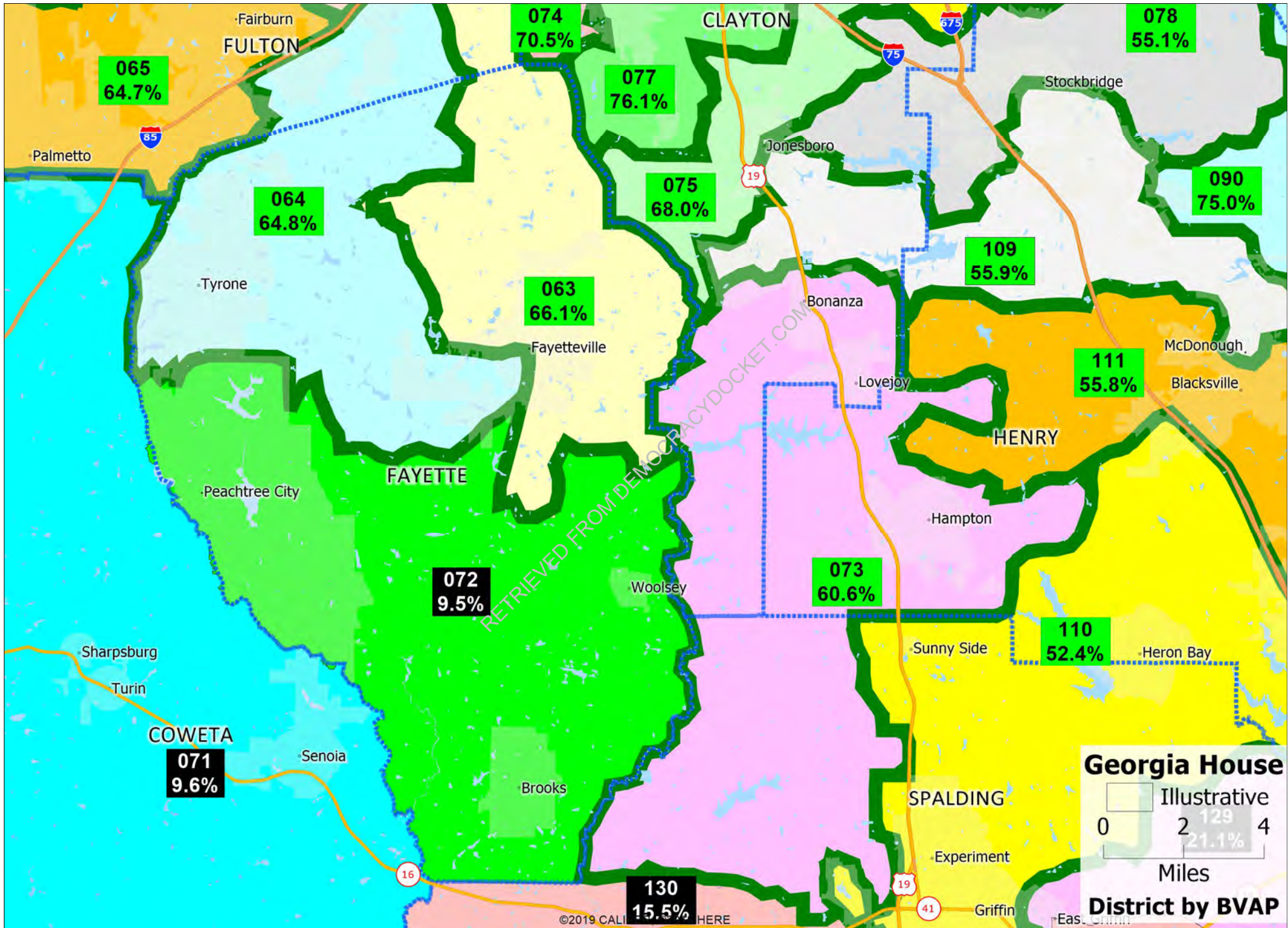




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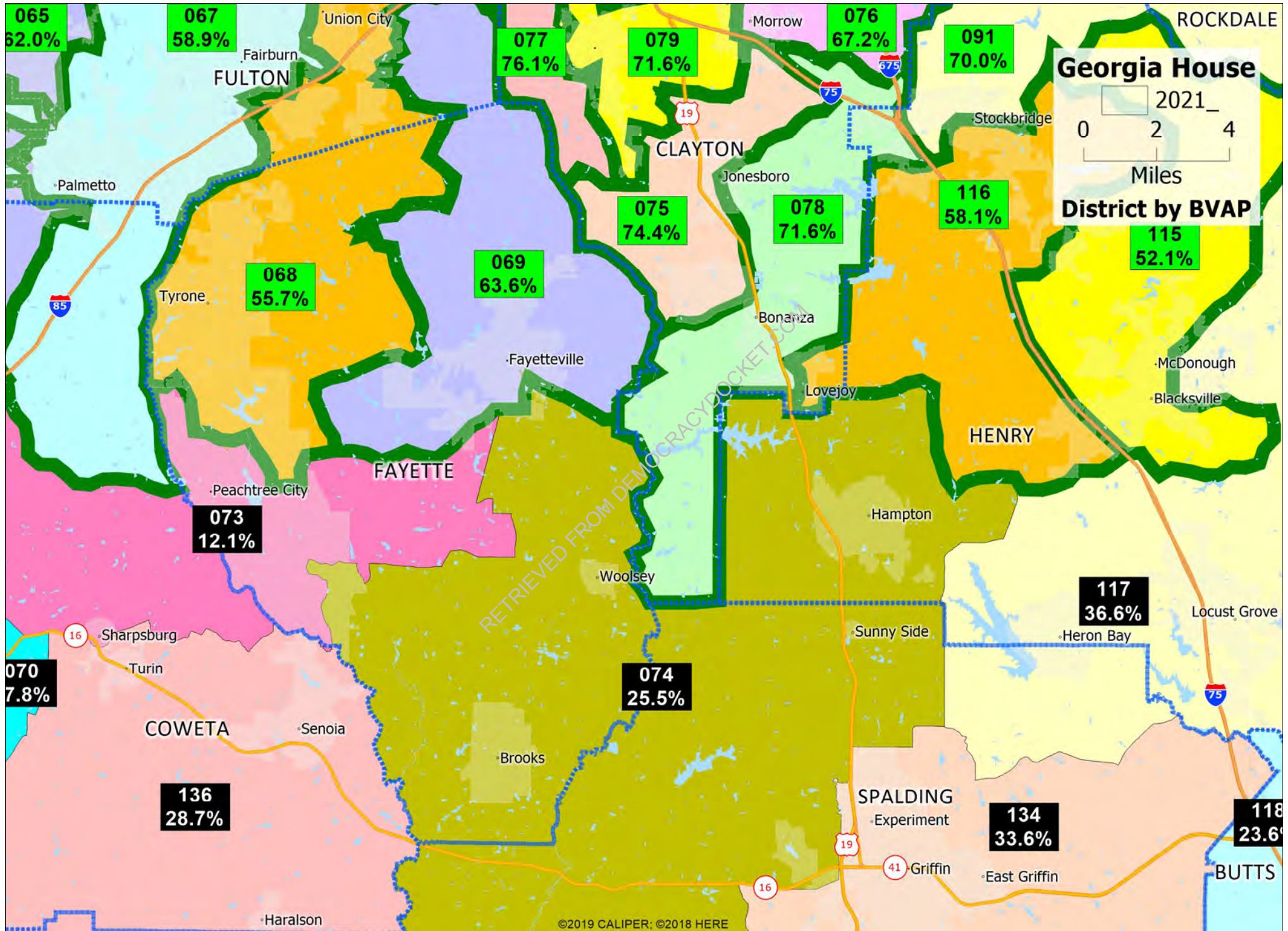




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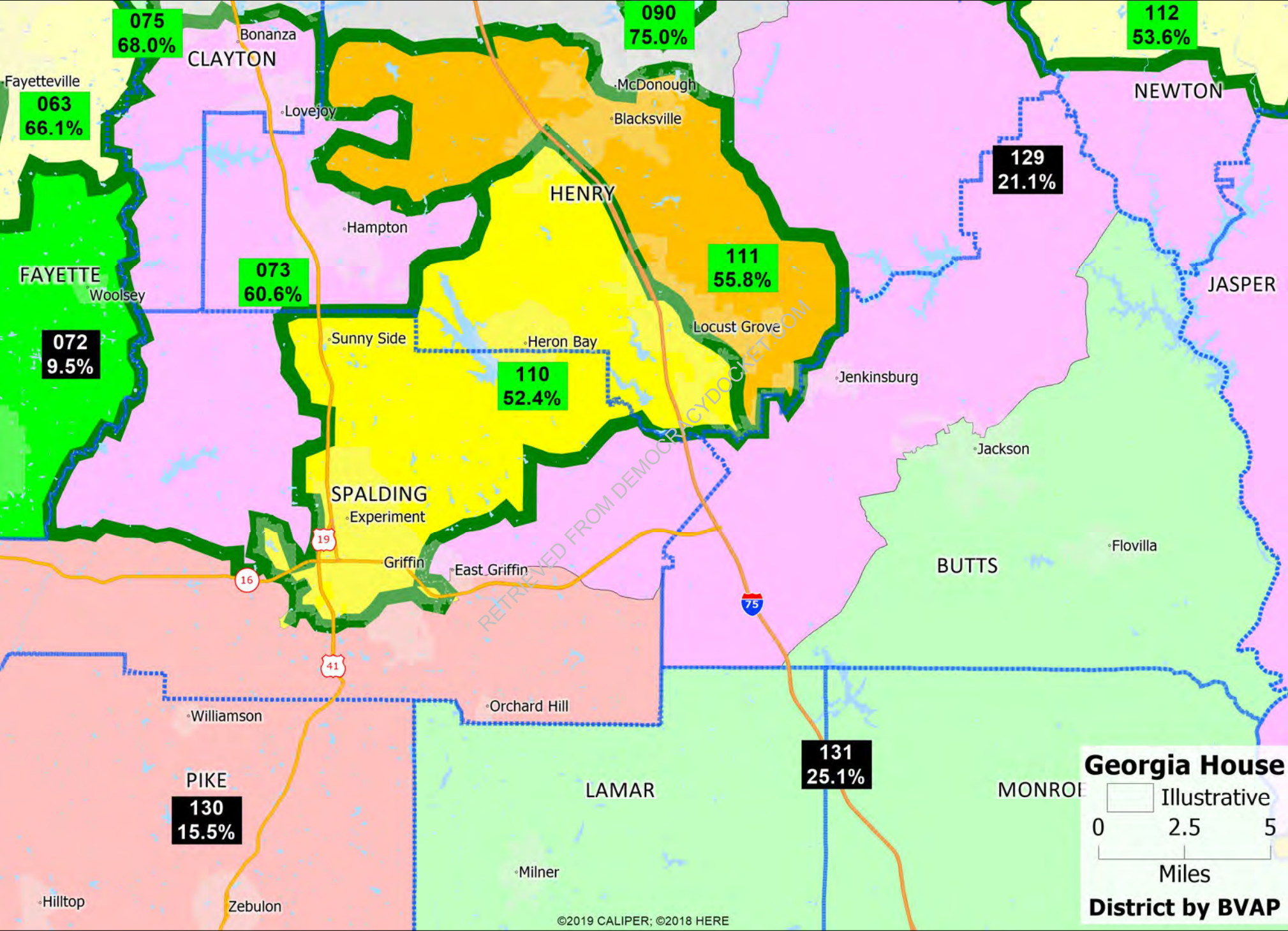




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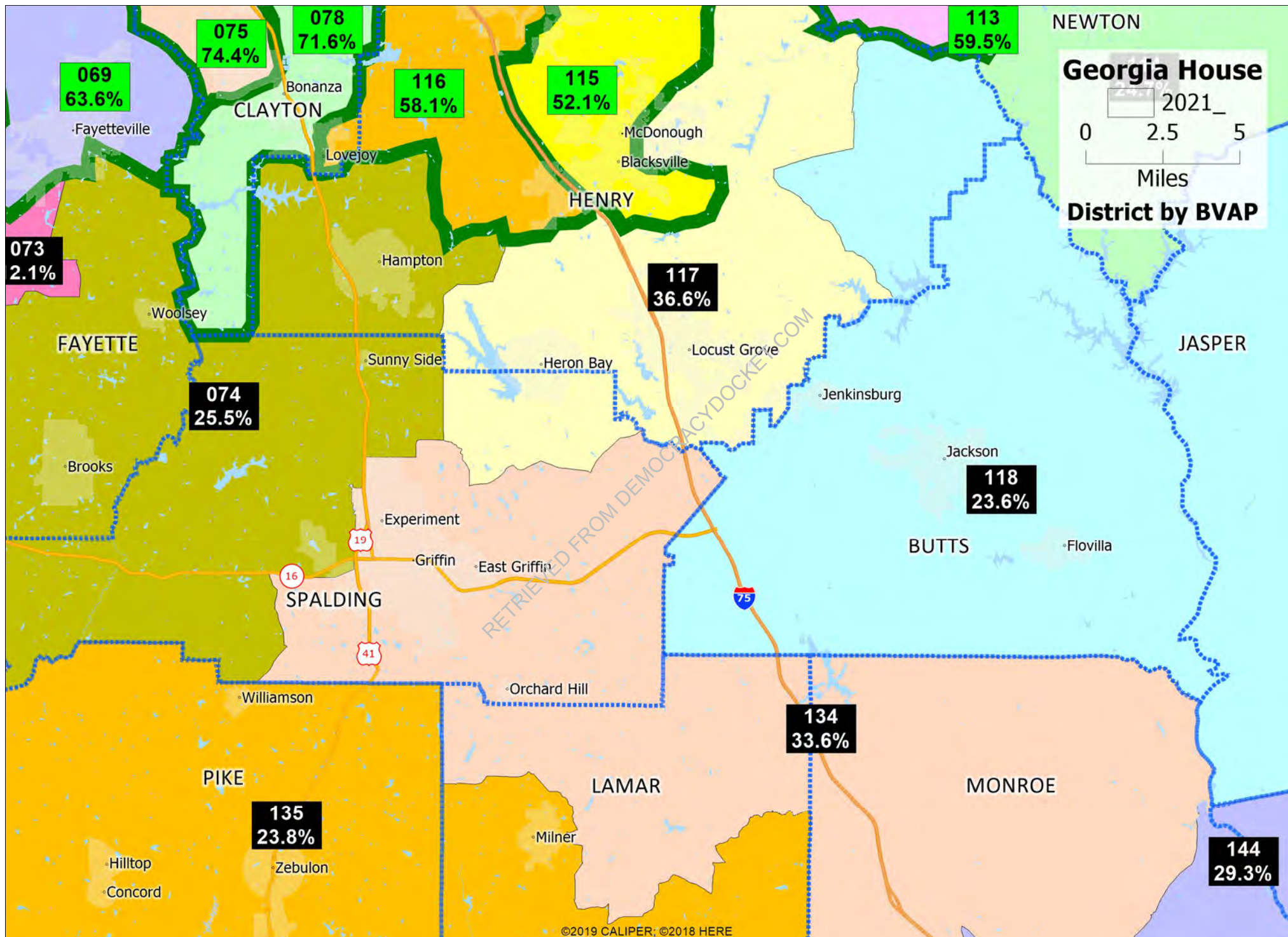




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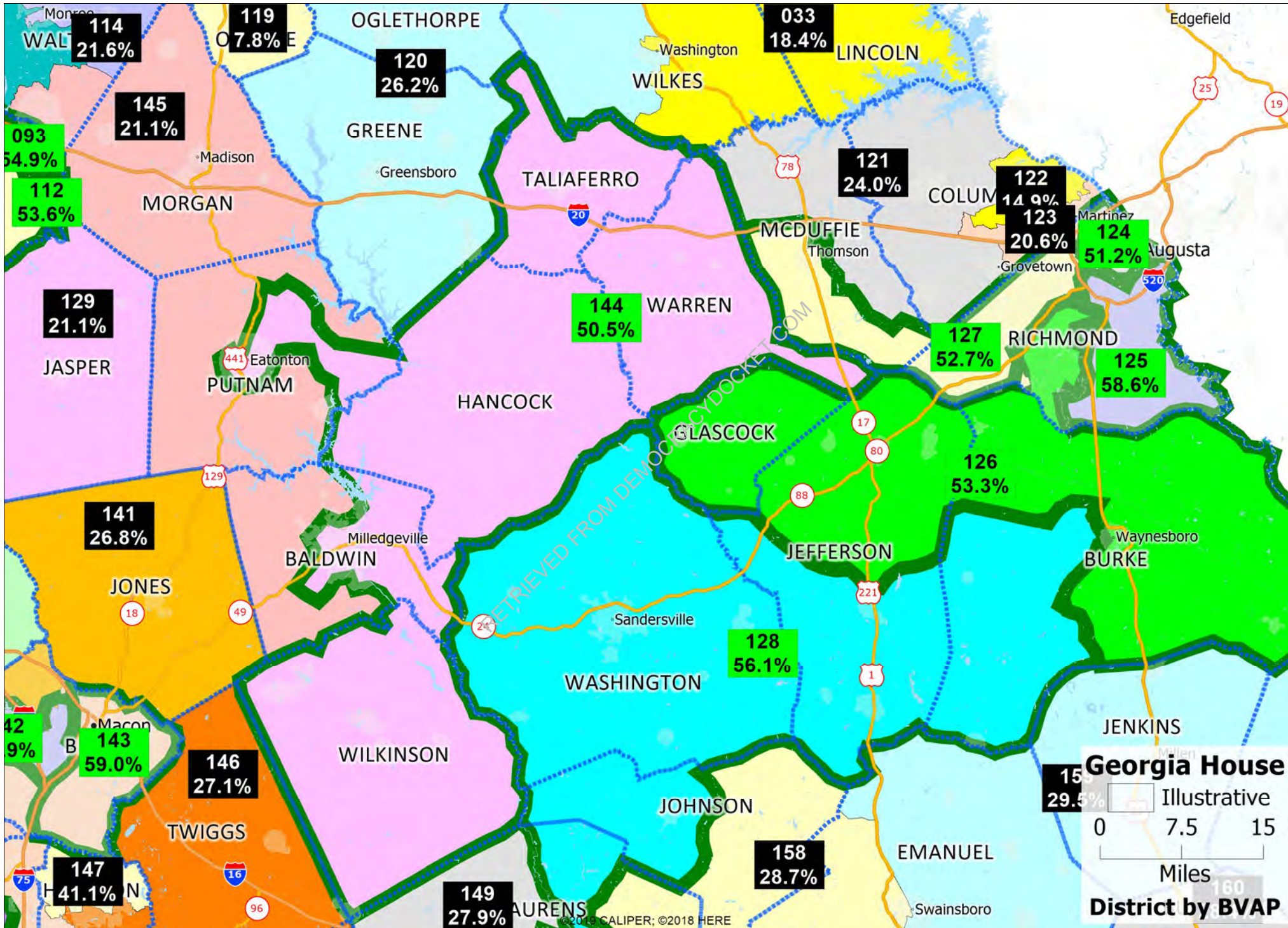




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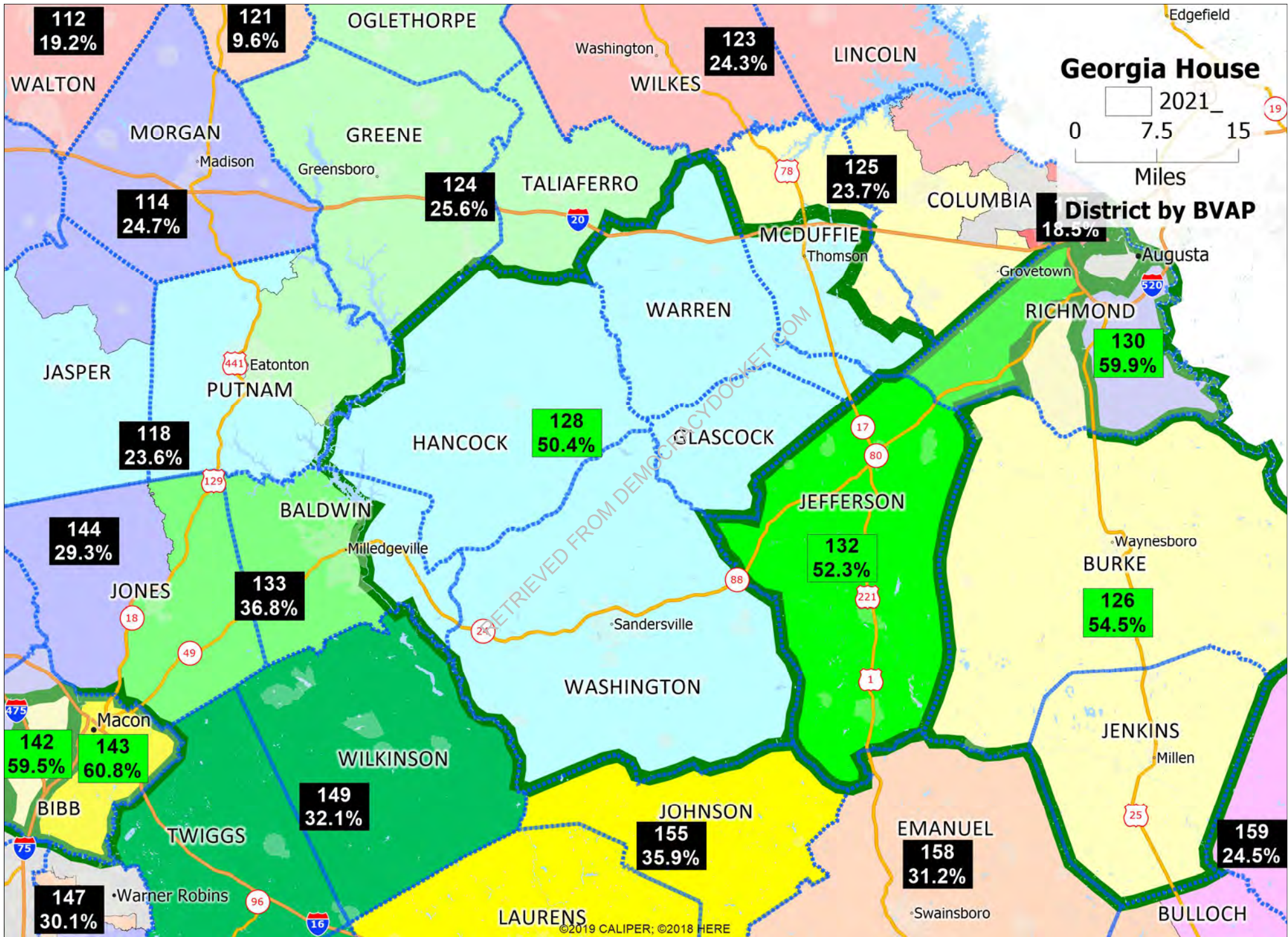




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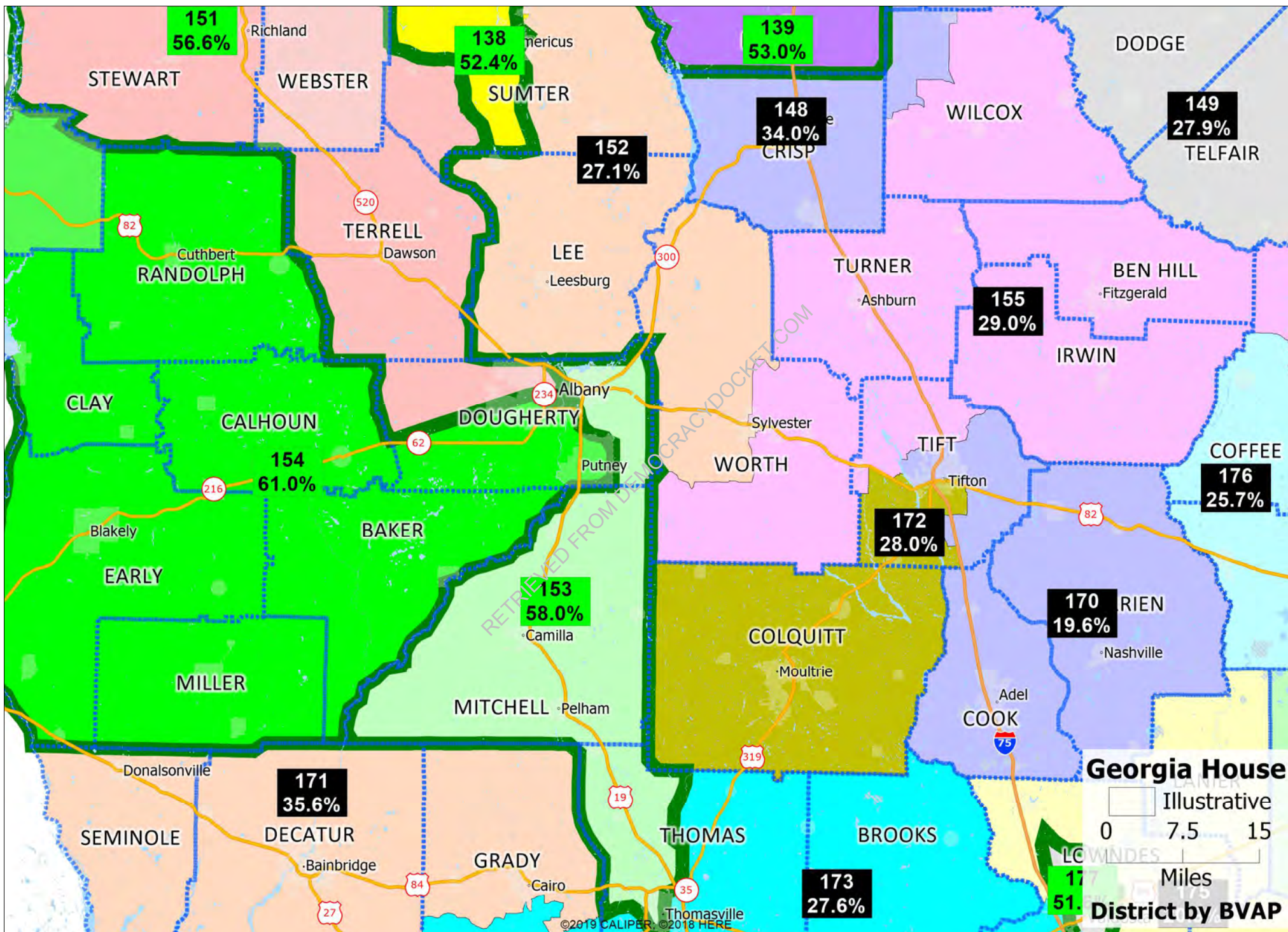




# EXHIBIT AE-1

RETRIEVED FROM DEMOCRACYDOCKET.COM





# EXHIBIT AF-1

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User:

Plan Name: **Ga\_House\_Illustrative\_Plan**

Plan Type:

## Political Subdivision Splits Between Districts

Thursday, January 6, 2022

8:45 AM

### Split Counts

Number of subdivisions split into more than one district: Number of splits involving no population:

County 74 County 0

Number of times a subdivision is split into multiple districts:

County 206

Voting District 278

County	District	Population
<i>Split Counties:</i>		
Appling GA	156	8,078
Appling GA	178	10,366
Baldwin GA	144	26,814
Baldwin GA	145	16,985
Barrow GA	114	29,368
Barrow GA	116	40,657
Barrow GA	119	13,480
Bartow GA	014	44,612
Bartow GA	015	59,492
Bartow GA	036	4,797
Bibb GA	140	6,329
Bibb GA	141	31,288
Bibb GA	142	59,571
Bibb GA	143	60,158
Bryan GA	157	31,000
Bryan GA	164	13,738
Bulloch GA	158	14,375
Bulloch GA	160	60,376
Bulloch GA	164	6,348
Burke GA	126	20,345
Burke GA	128	4,251
Butts GA	129	11,561
Butts GA	131	13,873
Carroll GA	016	5,253
Carroll GA	018	59,116
Carroll GA	068	45,287
Carroll GA	069	9,492
Catoosa GA	002	7,673
Catoosa GA	003	60,199
Charlton GA	174	10,904
Charlton GA	180	1,614
Chatham GA	161	18,589
Chatham GA	162	58,812

**Political Subdivison Splits Between Districts**

Ga\_House\_Illustrative\_Plan

<b>County</b>	<b>District</b>	<b>Population</b>
Chatham GA	163	60,132
Chatham GA	164	38,620
Chatham GA	165	58,747
Chatham GA	166	60,391
Chattooga GA	002	7,303
Chattooga GA	012	17,662
Cherokee GA	011	26,562
Cherokee GA	020	59,666
Cherokee GA	021	60,270
Cherokee GA	023	60,197
Cherokee GA	169	59,925
Clarke GA	117	48,704
Clarke GA	118	60,268
Clarke GA	120	19,699
Clayton GA	062	6,868
Clayton GA	073	37,295
Clayton GA	074	58,666
Clayton GA	075	58,818
Clayton GA	076	44,724
Clayton GA	077	58,912
Clayton GA	078	18,396
Clayton GA	109	13,916
Cobb GA	017	8,063
Cobb GA	034	58,806
Cobb GA	035	59,432
Cobb GA	036	53,951
Cobb GA	037	58,759
Cobb GA	038	58,628
Cobb GA	039	59,217
Cobb GA	040	30,828
Cobb GA	041	58,750
Cobb GA	042	59,492
Cobb GA	043	58,895
Cobb GA	044	58,816
Cobb GA	045	38,002
Cobb GA	046	60,086
Cobb GA	053	44,424
Coffee GA	155	3,595
Coffee GA	176	39,497
Columbia GA	121	51,535
Columbia GA	122	58,712
Columbia GA	123	45,763
Coweta GA	069	26,292
Coweta GA	070	59,744
Coweta GA	071	60,122
Crawford GA	139	5,687
Crawford GA	140	6,443



**Political Subdivison Splits Between Districts**

Ga\_House\_Illustrative\_Plan

<b>County</b>	<b>District</b>	<b>Population</b>
DeKalb GA	079	58,770
DeKalb GA	080	59,573
DeKalb GA	081	42,476
DeKalb GA	082	59,452
DeKalb GA	083	58,898
DeKalb GA	084	58,670
DeKalb GA	085	58,922
DeKalb GA	086	59,065
DeKalb GA	087	59,585
DeKalb GA	088	37,209
DeKalb GA	089	59,915
DeKalb GA	090	38,397
DeKalb GA	091	45,171
DeKalb GA	092	59,982
DeKalb GA	094	8,297
Dougherty GA	151	41,723
Dougherty GA	153	20,758
Dougherty GA	154	23,309
Douglas GA	061	33,185
Douglas GA	065	12,451
Douglas GA	066	51,285
Douglas GA	067	33,805
Douglas GA	068	13,511
Effingham GA	159	24,580
Effingham GA	161	40,189
Emanuel GA	158	9,800
Emanuel GA	159	12,968
Fayette GA	063	34,836
Fayette GA	064	25,702
Fayette GA	072	58,656
Floyd GA	005	1,448
Floyd GA	012	41,214
Floyd GA	013	55,922
Forsyth GA	024	60,138
Forsyth GA	025	59,131
Forsyth GA	026	58,847
Forsyth GA	027	1,312
Forsyth GA	097	12,284
Forsyth GA	137	59,571
Fulton GA	022	58,963
Fulton GA	040	28,259
Fulton GA	045	20,710
Fulton GA	047	59,665
Fulton GA	048	59,887
Fulton GA	049	58,771
Fulton GA	050	12,563
Fulton GA	051	60,227

**Political Subdivison Splits Between Districts**

Ga\_House\_Illustrative\_Plan

<b>County</b>	<b>District</b>	<b>Population</b>
Fulton GA	052	60,265
Fulton GA	053	14,406
Fulton GA	054	59,230
Fulton GA	055	59,073
Fulton GA	056	59,420
Fulton GA	057	59,610
Fulton GA	058	59,735
Fulton GA	059	58,942
Fulton GA	060	59,197
Fulton GA	061	26,481
Fulton GA	062	52,516
Fulton GA	063	23,970
Fulton GA	064	33,449
Fulton GA	065	46,469
Fulton GA	066	9,062
Fulton GA	067	25,840
Glynn GA	167	21,219
Glynn GA	179	59,502
Glynn GA	180	3,778
Grady GA	171	21,867
Grady GA	173	4,369
Gwinnett GA	050	46,621
Gwinnett GA	081	16,712
Gwinnett GA	088	21,496
Gwinnett GA	094	50,987
Gwinnett GA	095	58,825
Gwinnett GA	096	58,713
Gwinnett GA	097	46,487
Gwinnett GA	098	46,390
Gwinnett GA	099	58,815
Gwinnett GA	100	58,895
Gwinnett GA	101	60,372
Gwinnett GA	102	59,365
Gwinnett GA	103	59,725
Gwinnett GA	104	58,654
Gwinnett GA	105	58,966
Gwinnett GA	106	58,654
Gwinnett GA	107	59,972
Gwinnett GA	108	58,895
Gwinnett GA	116	18,518
Habersham GA	010	22,398
Habersham GA	028	23,633
Hall GA	010	14,042
Hall GA	027	58,514
Hall GA	029	58,965
Hall GA	030	59,376
Hall GA	098	12,239

**Political Subdivison Splits Between Districts**

Ga\_House\_Illustrative\_Plan

<b>County</b>	<b>District</b>	<b>Population</b>
Henry GA	073	15,552
Henry GA	076	15,389
Henry GA	078	40,652
Henry GA	090	15,884
Henry GA	109	46,209
Henry GA	110	23,709
Henry GA	111	59,060
Henry GA	129	24,257
Houston GA	140	35,208
Houston GA	146	39,667
Houston GA	147	60,203
Houston GA	148	28,555
Jackson GA	031	59,858
Jackson GA	117	11,264
Jackson GA	119	4,785
Jeff Davis GA	149	7,904
Jeff Davis GA	156	6,875
Jefferson GA	126	7,976
Jefferson GA	128	7,733
Johnson GA	128	6,076
Johnson GA	158	3,113
Laurens GA	128	21,730
Laurens GA	149	20,087
Laurens GA	158	7,753
Liberty GA	157	5,486
Liberty GA	168	59,770
Lowndes GA	173	11,611
Lowndes GA	175	46,752
Lowndes GA	177	59,888
Madison GA	032	897
Madison GA	033	29,223
McDuffie GA	121	7,521
McDuffie GA	127	14,111
Murray GA	004	6,097
Murray GA	006	30,431
Murray GA	007	3,445
Muscogee GA	134	60,267
Muscogee GA	135	60,394
Muscogee GA	136	60,319
Muscogee GA	138	25,942
Newton GA	093	22,158
Newton GA	112	60,318
Newton GA	113	25,448
Newton GA	129	4,559
Paulding GA	017	50,739
Paulding GA	019	58,641
Paulding GA	150	59,281

**Political Subdivison Splits Between Districts**

Ga\_House\_Illustrative\_Plan

<b>County</b>	<b>District</b>	<b>Population</b>
Peach GA	139	15,754
Peach GA	140	12,227
Polk GA	013	4,131
Polk GA	014	14,698
Polk GA	016	24,024
Putnam GA	144	7,835
Putnam GA	145	14,212
Richmond GA	123	13,551
Richmond GA	124	59,743
Richmond GA	125	60,329
Richmond GA	126	28,114
Richmond GA	127	44,870
Rockdale GA	090	6,091
Rockdale GA	091	15,219
Rockdale GA	093	38,102
Rockdale GA	113	34,158
Spalding GA	073	7,517
Spalding GA	110	36,624
Spalding GA	129	4,059
Spalding GA	130	19,106
Stephens GA	028	17,392
Stephens GA	032	9,392
Sumter GA	138	17,047
Sumter GA	151	1,671
Sumter GA	152	10,898
Talbot GA	132	5,416
Talbot GA	138	317
Tattnall GA	156	9,717
Tattnall GA	157	13,125
Thomas GA	153	17,802
Thomas GA	173	27,996
Tift GA	155	4,093
Tift GA	170	24,034
Tift GA	172	13,217
Troup GA	069	12,338
Troup GA	132	32,744
Troup GA	133	24,344
Upson GA	130	21,592
Upson GA	139	6,108
Walker GA	001	43,186
Walker GA	002	24,468
Walton GA	114	30,092
Walton GA	115	59,186
Walton GA	145	7,395
Ware GA	174	23,895
Ware GA	176	12,356
Wayne GA	167	11,105



**Political Subdivison Splits Between Districts**

Ga\_House\_Illustrative\_Plan

<b>County</b>	<b>District</b>	<b>Population</b>
Wayne GA	178	19,039
White GA	008	5,357
White GA	010	22,646
Whitfield GA	002	20,506
Whitfield GA	004	53,618
Whitfield GA	006	28,740
Wilcox GA	148	1,030
Wilcox GA	155	7,736
Wilkes GA	033	3,036
Wilkes GA	120	6,529
Worth GA	152	11,775
Worth GA	155	9,009
<i>Split VTDs:</i>		
Appling GA	156	3,560
Appling GA	178	3
Baldwin GA	144	1,306
Baldwin GA	145	337
Baldwin GA	144	348
Baldwin GA	145	3,316
Baldwin GA	144	364
Baldwin GA	145	4,528
Baldwin GA	144	1,417
Baldwin GA	145	1,947
Baldwin GA	144	3,443
Baldwin GA	145	263
Baldwin GA	144	0
Baldwin GA	145	2,631
Barrow GA	114	3,331
Barrow GA	119	1,441
Barrow GA	114	4,628
Barrow GA	116	1,350
Barrow GA	114	1,280
Barrow GA	116	3,104
Bartow GA	014	4,660
Bartow GA	015	5,708
Bartow GA	014	16,566
Bartow GA	015	39
Bartow GA	014	5,753
Bartow GA	015	7
Bartow GA	014	2,236
Bartow GA	015	25
Bartow GA	036	344
Bibb GA	142	1,777
Bibb GA	143	9,157
Bibb GA	141	4,677
Bibb GA	142	1,266
Bibb GA	140	1,051

**Political Subdivison Splits Between Districts**

Ga\_House\_Illustrative\_Plan

<b>County</b>	<b>District</b>	<b>Population</b>
Bibb GA	142	2,418
Bryan GA	157	2,342
Bryan GA	164	1,291
Bryan GA	157	1,480
Bryan GA	164	1,439
Bulloch GA	158	2,073
Bulloch GA	160	10,606
Bulloch GA	158	45
Bulloch GA	160	2,562
Bulloch GA	158	858
Bulloch GA	160	657
Bulloch GA	160	1,049
Bulloch GA	164	2,128
Burke GA	126	3,371
Burke GA	128	1,160
Butts GA	129	11,561
Butts GA	131	13,873
Chatham GA	164	6,491
Chatham GA	166	1,863
Chatham GA	161	3,060
Chatham GA	164	1,794
Chatham GA	163	349
Chatham GA	166	3,278
Chatham GA	164	1,519
Chatham GA	166	4,043
Chatham GA	163	332
Chatham GA	165	2,049
Chatham GA	163	1,613
Chatham GA	166	3,310
Chatham GA	163	2,625
Chatham GA	166	146
Chatham GA	163	2,292
Chatham GA	166	527
Cherokee GA	020	1,844
Cherokee GA	023	3,527
Cherokee GA	021	243
Cherokee GA	169	5,261
Cherokee GA	021	149
Cherokee GA	023	6,236
Cherokee GA	011	8,887
Cherokee GA	023	4,027
Cherokee GA	011	5,281
Cherokee GA	169	1,218
Cherokee GA	020	133
Cherokee GA	021	9,885
Cherokee GA	020	2,462
Cherokee GA	021	1,388

**Political Subdivison Splits Between Districts**

Ga\_House\_Illustrative\_Plan

<b>County</b>	<b>District</b>	<b>Population</b>
Cherokee GA	011	1,257
Cherokee GA	023	1,998
Cherokee GA	011	1,690
Cherokee GA	021	1,204
Cherokee GA	023	10,189
Cherokee GA	021	318
Cherokee GA	023	2,677
Cherokee GA	169	4,972
Clarke GA	117	414
Clarke GA	118	4,066
Clarke GA	117	0
Clarke GA	118	12,671
Clayton GA	074	5,659
Clayton GA	075	3,109
Clayton GA	074	1,469
Clayton GA	075	1,151
Clayton GA	075	5,775
Clayton GA	109	187
Clayton GA	074	601
Clayton GA	076	5,159
Clayton GA	075	2,143
Clayton GA	078	1,084
Clayton GA	074	1,753
Clayton GA	077	2,950
Cobb GA	035	3,155
Cobb GA	044	954
Cobb GA	045	1,650
Cobb GA	046	2,209
Cobb GA	042	12,920
Cobb GA	053	481
Cobb GA	041	8,663
Cobb GA	042	4,037
Cobb GA	039	7,665
Cobb GA	040	1,882
Cobb GA	034	2,972
Cobb GA	035	0
Cobb GA	044	1,471
Cobb GA	034	9,502
Cobb GA	035	0
Cobb GA	039	4,878
Cobb GA	040	484
Cobb GA	041	898
Cobb GA	039	4,044
Cobb GA	041	25
Cobb GA	039	1,005
Cobb GA	041	823
Cobb GA	037	234

**Political Subdivison Splits Between Districts**

Ga\_House\_Illustrative\_Plan

<b>County</b>	<b>District</b>	<b>Population</b>
Cobb GA	042	9,760
Cobb GA	034	1,950
Cobb GA	037	525
Cobb GA	034	1,844
Cobb GA	037	7,055
Cobb GA	037	689
Cobb GA	042	2,294
Cobb GA	043	1,351
Cobb GA	042	5,515
Cobb GA	043	1,396
Cobb GA	035	185
Cobb GA	036	4,776
Cobb GA	043	2,827
Cobb GA	045	951
Cobb GA	040	3,792
Cobb GA	041	45
Cobb GA	053	774
Cobb GA	034	0
Cobb GA	037	12,064
Cobb GA	041	924
Cobb GA	034	4,405
Cobb GA	037	500
Cobb GA	038	5,005
Cobb GA	039	9
Cobb GA	042	815
Cobb GA	043	6,122
Cobb GA	041	1,308
Cobb GA	053	8,484
Cobb GA	040	350
Cobb GA	041	7,858
Cobb GA	041	2,067
Cobb GA	053	4,922
Cobb GA	040	810
Cobb GA	053	7,281
Cobb GA	039	0
Cobb GA	040	642
Cobb GA	041	7,953
Cobb GA	042	9,626
Cobb GA	053	17
Cobb GA	040	700
Cobb GA	053	5,110
Cobb GA	040	847
Cobb GA	053	3,355
Columbia GA	122	684
Columbia GA	123	2,647
Columbia GA	121	772
Columbia GA	122	2,323



**Political Subdivison Splits Between Districts**

Ga\_House\_Illustrative\_Plan

<b>County</b>	<b>District</b>	<b>Population</b>
Columbia GA	121	811
Columbia GA	122	5,473
Coweta GA	070	15,758
Coweta GA	071	521
Coweta GA	069	2,155
Coweta GA	071	1,475
Crawford GA	139	1,495
Crawford GA	140	695
Crawford GA	139	1,533
Crawford GA	140	929
Crawford GA	139	271
Crawford GA	140	2,284
DeKalb GA	084	3,567
DeKalb GA	085	0
DeKalb GA	086	1,106
DeKalb GA	087	2,743
DeKalb GA	084	2,314
DeKalb GA	085	0
DeKalb GA	090	403
DeKalb GA	091	4,797
DeKalb GA	083	779
DeKalb GA	084	3,624
DeKalb GA	085	403
DeKalb GA	086	14,351
DeKalb GA	079	3,908
DeKalb GA	081	3,992
DeKalb GA	090	768
DeKalb GA	091	3,291
DeKalb GA	083	382
DeKalb GA	084	2,898
DeKalb GA	080	4,945
DeKalb GA	081	854
DeKalb GA	085	415
DeKalb GA	086	6,214
DeKalb GA	086	3,101
DeKalb GA	087	3,876
DeKalb GA	084	934
DeKalb GA	085	1,671
DeKalb GA	085	2,550
DeKalb GA	086	3,331
DeKalb GA	083	1,013
DeKalb GA	089	945
DeKalb GA	084	0
DeKalb GA	085	3,890
DeKalb GA	085	4,163
DeKalb GA	086	1,861
DeKalb GA	086	2,277

**Political Subdivison Splits Between Districts**

Ga\_House\_Illustrative\_Plan

<b>County</b>	<b>District</b>	<b>Population</b>
DeKalb GA	088	433
DeKalb GA	081	752
DeKalb GA	087	4,158
DeKalb GA	087	2,712
DeKalb GA	088	1,317
DeKalb GA	088	694
DeKalb GA	094	3,457
Dougherty GA	151	1,819
Dougherty GA	154	302
Dougherty GA	153	2,035
Dougherty GA	154	148
Dougherty GA	151	3,032
Dougherty GA	153	878
Dougherty GA	153	615
Dougherty GA	154	3,165
Dougherty GA	151	1,796
Dougherty GA	154	166
Douglas GA	061	2,979
Douglas GA	066	1,575
Douglas GA	065	6,145
Douglas GA	068	354
Douglas GA	066	7,208
Douglas GA	068	1,639
Emanuel GA	158	853
Emanuel GA	159	242
Emanuel GA	158	4,998
Emanuel GA	159	7,025
Floyd GA	005	894
Floyd GA	012	1,297
Floyd GA	012	408
Floyd GA	013	1,474
Floyd GA	012	4,296
Floyd GA	013	786
Forsyth GA	024	335
Forsyth GA	137	12,582
Forsyth GA	024	7,920
Forsyth GA	027	1,312
Forsyth GA	026	0
Forsyth GA	137	7,076
Forsyth GA	025	526
Forsyth GA	097	10,026
Forsyth GA	024	2,983
Forsyth GA	026	2,563
Forsyth GA	137	12,914
Forsyth GA	025	19,693
Forsyth GA	097	2,258
Fulton GA	057	4,436

**Political Subdivison Splits Between Districts**

Ga\_House\_Illustrative\_Plan

<b>County</b>	<b>District</b>	<b>Population</b>
Fulton GA	059	0
Fulton GA	040	2,709
Fulton GA	055	574
Fulton GA	053	171
Fulton GA	054	640
Fulton GA	055	2,082
Fulton GA	053	1,711
Fulton GA	055	432
Fulton GA	055	1,344
Fulton GA	056	1,268
Fulton GA	055	4,401
Fulton GA	056	723
Fulton GA	055	928
Fulton GA	056	785
Fulton GA	055	340
Fulton GA	061	3,418
Fulton GA	059	803
Fulton GA	060	878
Fulton GA	048	0
Fulton GA	049	7,302
Fulton GA	048	1,303
Fulton GA	049	1,989
Fulton GA	022	2,554
Fulton GA	047	0
Fulton GA	060	3,090
Fulton GA	062	914
Fulton GA	047	3,739
Fulton GA	050	1,318
Fulton GA	049	1,777
Fulton GA	050	2,641
Fulton GA	047	2,389
Fulton GA	049	1,899
Fulton GA	047	1,407
Fulton GA	049	2,672
Fulton GA	048	1,657
Fulton GA	049	1,988
Fulton GA	022	2,152
Fulton GA	047	2,763
Fulton GA	048	1,296
Fulton GA	051	2,573
Fulton GA	022	7,593
Fulton GA	048	343
Fulton GA	049	296
Fulton GA	048	2,300
Fulton GA	051	1,971
Fulton GA	065	1,190
Fulton GA	067	2,844

**Political Subdivison Splits Between Districts**

Ga\_House\_Illustrative\_Plan

<b>County</b>	<b>District</b>	<b>Population</b>
Fulton GA	062	44
Fulton GA	067	215
Glynn GA	167	2,071
Glynn GA	179	1,858
Grady GA	171	874
Grady GA	173	1,436
Gwinnett GA	088	2,772
Gwinnett GA	099	2,931
Gwinnett GA	094	4,339
Gwinnett GA	106	1,431
Gwinnett GA	106	3,891
Gwinnett GA	107	121
Gwinnett GA	104	5,206
Gwinnett GA	105	2,106
Gwinnett GA	050	5,030
Gwinnett GA	095	2,607
Gwinnett GA	050	4,452
Gwinnett GA	095	1,063
Gwinnett GA	095	5,610
Gwinnett GA	096	4,665
Gwinnett GA	050	3,389
Gwinnett GA	095	1,426
Gwinnett GA	102	4,961
Gwinnett GA	104	1,211
Gwinnett GA	105	0
Gwinnett GA	050	2,872
Gwinnett GA	100	4,105
Gwinnett GA	094	1,919
Gwinnett GA	106	6,540
Gwinnett GA	098	4,932
Gwinnett GA	103	3,647
Gwinnett GA	050	5,272
Gwinnett GA	097	3,984
Gwinnett GA	097	1,351
Gwinnett GA	098	5,685
Gwinnett GA	050	255
Gwinnett GA	097	5,020
Habersham GA	010	654
Habersham GA	028	2,334
Habersham GA	010	3,683
Habersham GA	028	8,861
Habersham GA	010	1,428
Habersham GA	028	9,231
Hall GA	029	1,976
Hall GA	030	3,509
Hall GA	029	13,214
Hall GA	030	1,135



**Political Subdivison Splits Between Districts**

Ga\_House\_Illustrative\_Plan

<b>County</b>	<b>District</b>	<b>Population</b>
Henry GA	090	4,198
Henry GA	109	2,954
Henry GA	109	2,292
Henry GA	111	827
Henry GA	129	3,411
Henry GA	109	1,677
Henry GA	111	2,444
Henry GA	090	17
Henry GA	109	5,952
Henry GA	073	7,823
Henry GA	111	2,631
Henry GA	078	1,536
Henry GA	109	5,733
Henry GA	078	2,361
Henry GA	090	2,907
Henry GA	073	7,729
Henry GA	111	214
Henry GA	111	1,217
Henry GA	129	3,566
Houston GA	146	2,680
Houston GA	147	4,003
Houston GA	140	6,474
Houston GA	148	775
Houston GA	146	8,031
Houston GA	147	1,815
Houston GA	146	2,885
Houston GA	147	14,913
Houston GA	140	1,542
Houston GA	148	19,300
Houston GA	140	369
Houston GA	147	8,749
Houston GA	146	5,586
Houston GA	148	4,039
Jackson GA	031	23,432
Jackson GA	119	951
Jackson GA	031	14,866
Jackson GA	117	4,381
Jackson GA	031	693
Jackson GA	117	6,883
Jackson GA	119	3,834
Jefferson GA	126	889
Jefferson GA	128	4,832
Laurens GA	128	1,456
Laurens GA	149	4,133
Liberty GA	157	843
Liberty GA	168	8,610
Lowndes GA	173	4,399

**Political Subdivison Splits Between Districts**

Ga\_House\_Illustrative\_Plan

<b>County</b>	<b>District</b>	<b>Population</b>
Lowndes GA	175	10,755
Lowndes GA	175	14,140
Lowndes GA	177	7,207
Muscogee GA	135	2,669
Muscogee GA	136	2,199
Muscogee GA	136	402
Muscogee GA	138	13,374
Muscogee GA	134	7,922
Muscogee GA	136	2,222
Newton GA	112	4,731
Newton GA	113	2,544
Newton GA	112	1,154
Newton GA	129	3,884
Newton GA	112	4,205
Newton GA	113	331
Newton GA	129	675
Paulding GA	019	916
Paulding GA	150	9,977
Paulding GA	019	12,851
Paulding GA	150	1,145
Paulding GA	017	2,427
Paulding GA	019	1,111
Paulding GA	150	18,616
Putnam GA	144	2,003
Putnam GA	145	3,200
Putnam GA	144	4,783
Putnam GA	145	496
Putnam GA	144	1,049
Putnam GA	145	685
Richmond GA	123	994
Richmond GA	124	2,262
Richmond GA	123	1,981
Richmond GA	127	4,662
Richmond GA	125	3,272
Richmond GA	127	1,659
Richmond GA	123	1,423
Richmond GA	124	1,520
Rockdale GA	090	1,310
Rockdale GA	113	4,727
Rockdale GA	093	3,322
Rockdale GA	113	1,814
Rockdale GA	091	4,936
Rockdale GA	093	0
Rockdale GA	091	1,151
Rockdale GA	093	5,293
Rockdale GA	093	10,575
Rockdale GA	113	392

**Political Subdivison Splits Between Districts**

Ga\_House\_Illustrative\_Plan

<b>County</b>	<b>District</b>	<b>Population</b>
Rockdale GA	091	3,730
Rockdale GA	093	1,088
Spalding GA	110	1,020
Spalding GA	129	1,366
Spalding GA	130	586
Spalding GA	110	450
Spalding GA	130	2,620
Spalding GA	073	3,711
Spalding GA	110	10
Spalding GA	073	231
Spalding GA	110	6,661
Spalding GA	110	2,213
Spalding GA	130	1,499
Spalding GA	110	0
Spalding GA	130	2,548
Sumter GA	138	3,517
Sumter GA	152	1
Sumter GA	138	297
Sumter GA	152	2,384
Sumter GA	138	2,040
Sumter GA	152	4,077
Sumter GA	138	373
Sumter GA	151	1,245
Sumter GA	138	5,197
Sumter GA	152	429
Sumter GA	138	632
Sumter GA	151	426
Talbot GA	132	233
Talbot GA	138	317
Tattnall GA	156	722
Tattnall GA	157	3,511
Tattnall GA	156	2,392
Tattnall GA	157	1,578
Tattnall GA	156	1,684
Tattnall GA	157	8
Tattnall GA	156	4,919
Tattnall GA	157	157
Thomas GA	153	1,476
Thomas GA	173	71
Thomas GA	153	2,640
Thomas GA	173	297
Thomas GA	153	238
Thomas GA	173	3,111
Thomas GA	153	569
Thomas GA	173	3,063
Tift GA	155	308
Tift GA	170	2,707

**Political Subdivision Splits Between Districts**

Ga\_House\_Illustrative\_Plan

<b>County</b>	<b>District</b>	<b>Population</b>
Tift GA	170	1,147
Tift GA	172	960
Tift GA	155	1,509
Tift GA	172	316
Tift GA	155	386
Tift GA	170	5,710
Troup GA	132	2,015
Troup GA	133	3,700
Troup GA	069	2,057
Troup GA	132	2,290
Upson GA	130	7,249
Upson GA	139	4,819
Walton GA	114	887
Walton GA	115	423
Walton GA	145	163
Walton GA	114	4,160
Walton GA	115	1,781
Walton GA	115	1,034
Walton GA	145	507
Wayne GA	167	329
Wayne GA	178	2,932
Whitfield GA	002	791
Whitfield GA	004	1,723
Wilcox GA	148	784
Wilcox GA	155	171
Wilcox GA	148	246
Wilcox GA	155	1,158
Wilkes GA	033	541
Wilkes GA	120	679
Worth GA	152	4,067
Worth GA	155	273
Worth GA	152	118
Worth GA	155	2,015



# EXHIBIT AF-2

RETRIEVED FROM DEMOCRACYDOCKET.COM

User:

Plan Name: **Benchmark 2014 Plan**Plan Type: **Senate****Political Subdivision Splits Between Districts**

Thursday, January 6, 2022

8:55 AM

**Split Counts**

Number of subdivisions split into more than one district: Number of splits involving no population:

County 38 County 0

Number of times a subdivision is split into multiple districts:

County 65

Voting District 136

<b>County</b>	<b>District</b>	<b>Population</b>
<i>Split Counties:</i>		
Bartow GA	14	66,766
Bartow GA	52	42,135
Bibb GA	18	57,255
Bibb GA	25	13,774
Bibb GA	26	86,317
Carroll GA	28	12,484
Carroll GA	30	106,664
Charlton GA	3	9,186
Charlton GA	7	3,332
Chatham GA	1	105,799
Chatham GA	2	189,492
Chattooga GA	52	2,099
Chattooga GA	53	22,866
Cherokee GA	14	113,395
Cherokee GA	21	144,103
Cherokee GA	56	9,122
Clarke GA	46	80,075
Clarke GA	47	48,596
Clayton GA	34	155,066
Clayton GA	44	142,529
Cobb GA	6	112,153
Cobb GA	14	21,460
Cobb GA	32	166,845
Cobb GA	33	194,620
Cobb GA	37	192,450
Cobb GA	38	78,621
Columbia GA	23	34,830
Columbia GA	24	121,180
DeKalb GA	10	91,065
DeKalb GA	40	154,756
DeKalb GA	41	139,553
DeKalb GA	42	188,406
DeKalb GA	43	51,713

**Political Subdivison Splits Between Districts**

Enacted Senate B-V-C

<b>County</b>	<b>District</b>	<b>Population</b>
DeKalb GA	44	55,842
DeKalb GA	55	83,047
Douglas GA	30	38,405
Douglas GA	35	105,832
Emanuel GA	4	15,972
Emanuel GA	23	6,796
Fayette GA	16	80,417
Fayette GA	34	38,777
Forsyth GA	27	247,844
Forsyth GA	51	3,439
Fulton GA	6	98,379
Fulton GA	21	69,557
Fulton GA	28	2,645
Fulton GA	32	24,975
Fulton GA	35	101,619
Fulton GA	36	194,797
Fulton GA	38	115,726
Fulton GA	39	205,632
Fulton GA	40	10,084
Fulton GA	48	63,353
Fulton GA	56	179,943
Gordon GA	52	36,593
Gordon GA	54	20,951
Gwinnett GA	5	196,143
Gwinnett GA	9	208,385
Gwinnett GA	40	30,729
Gwinnett GA	41	56,587
Gwinnett GA	45	214,703
Gwinnett GA	48	134,053
Gwinnett GA	55	116,462
Hall GA	49	196,756
Hall GA	50	6,380
Henry GA	10	98,285
Henry GA	17	142,427
Houston GA	18	28,294
Houston GA	20	122,866
Houston GA	26	12,473
Jackson GA	47	39,860
Jackson GA	50	36,047
Jones GA	25	10,646
Jones GA	26	17,701
Liberty GA	1	48,350
Liberty GA	19	16,906
Mitchell GA	11	10,482
Mitchell GA	12	11,273
Muscogee GA	15	120,417
Muscogee GA	29	86,505

**Political Subdivison Splits Between Districts**

Enacted Senate B-V-C

<b>County</b>	<b>District</b>	<b>Population</b>
Newton GA	17	42,844
Newton GA	43	69,639
Paulding GA	30	40,559
Paulding GA	31	128,102
Pickens GA	51	20,594
Pickens GA	54	12,622
Richmond GA	22	177,079
Richmond GA	23	28,691
Richmond GA	24	837
Rockdale GA	17	18,357
Rockdale GA	43	75,213
Sumter GA	12	22,647
Sumter GA	13	6,969
Tattnall GA	4	9,697
Tattnall GA	19	13,145
Thomas GA	8	7,615
Thomas GA	11	38,183
Troup GA	28	21,060
Troup GA	29	48,366
Walton GA	25	14,790
Walton GA	46	81,883
Wilcox GA	7	4,634
Wilcox GA	13	4,132
<i>Split VTDs:</i>		
Bartow GA	14	7,937
Bartow GA	52	2,431
Bartow GA	14	0
Bartow GA	52	11,544
Bartow GA	14	55
Bartow GA	52	4,398
Bartow GA	14	0
Bartow GA	52	5,760
Bibb GA	18	0
Bibb GA	26	7,233
Bibb GA	18	3,716
Bibb GA	25	8,938
Bibb GA	18	2,840
Bibb GA	26	1,941
Carroll GA	28	2,102
Carroll GA	30	2,084
Carroll GA	28	0
Carroll GA	30	6,319
Charlton GA	3	250
Charlton GA	7	796
Charlton GA	3	74
Charlton GA	7	299
Chatham GA	1	4,854



**Political Subdivison Splits Between Districts**

Enacted Senate B-V-C

<b>County</b>	<b>District</b>	<b>Population</b>
Chatham GA	2	0
Chatham GA	1	10,322
Chatham GA	2	0
Chatham GA	1	136
Chatham GA	2	11,852
Chatham GA	1	1,940
Chatham GA	2	1,221
Cherokee GA	14	2,161
Cherokee GA	21	3,210
Cherokee GA	14	235
Cherokee GA	21	5,348
Cherokee GA	21	896
Cherokee GA	56	9,122
Clayton GA	34	0
Clayton GA	44	5,962
Clayton GA	34	0
Clayton GA	44	5,626
Cobb GA	14	4,918
Cobb GA	32	3,763
Cobb GA	6	13,386
Cobb GA	33	15
Cobb GA	33	1,395
Cobb GA	37	2,527
Cobb GA	32	3,257
Cobb GA	33	1,944
Cobb GA	33	465
Cobb GA	37	5,405
Cobb GA	32	2,462
Cobb GA	33	1,956
Cobb GA	14	599
Cobb GA	37	3,844
Cobb GA	14	0
Cobb GA	37	9,502
Cobb GA	33	3,613
Cobb GA	38	2,070
Cobb GA	33	5,734
Cobb GA	37	0
Cobb GA	6	4,288
Cobb GA	33	5,706
Cobb GA	33	2,163
Cobb GA	37	312
Cobb GA	33	8,899
Cobb GA	37	0
Cobb GA	33	3,175
Cobb GA	37	1,586
Cobb GA	32	1,996
Cobb GA	33	2,558

**Political Subdivison Splits Between Districts**

Enacted Senate B-V-C

<b>County</b>	<b>District</b>	<b>Population</b>
Cobb GA	6	2,819
Cobb GA	33	4,092
Cobb GA	33	4,563
Cobb GA	37	0
Cobb GA	6	6,108
Cobb GA	38	18
Cobb GA	6	0
Cobb GA	38	7,801
Cobb GA	6	3,998
Cobb GA	38	613
Cobb GA	6	1,580
Cobb GA	33	11,408
Cobb GA	33	6,498
Cobb GA	37	0
Cobb GA	14	1,785
Cobb GA	32	1,900
Cobb GA	6	9,407
Cobb GA	38	385
Cobb GA	6	3,009
Cobb GA	38	5,199
Cobb GA	6	6,937
Cobb GA	33	52
Cobb GA	6	7,365
Cobb GA	38	726
Cobb GA	6	5,076
Cobb GA	32	4,735
Cobb GA	14	6,409
Cobb GA	37	0
Columbia GA	23	3,125
Columbia GA	24	24
Columbia GA	23	0
Columbia GA	24	2,945
Columbia GA	23	6,021
Columbia GA	24	18
DeKalb GA	41	277
DeKalb GA	42	3,290
DeKalb GA	42	0
DeKalb GA	44	3,608
DeKalb GA	41	14,754
DeKalb GA	42	0
DeKalb GA	41	2,485
DeKalb GA	42	0
DeKalb GA	40	2,899
DeKalb GA	42	10,190
DeKalb GA	42	4,553
DeKalb GA	44	398
DeKalb GA	10	7,575

**Political Subdivision Splits Between Districts**

Enacted Senate B-V-C

<b>County</b>	<b>District</b>	<b>Population</b>
DeKalb GA	43	0
DeKalb GA	41	1,304
DeKalb GA	42	4,577
DeKalb GA	10	6,326
DeKalb GA	55	35
DeKalb GA	43	3,296
DeKalb GA	55	460
DeKalb GA	42	0
DeKalb GA	44	3,001
DeKalb GA	43	193
DeKalb GA	55	2,871
DeKalb GA	43	5,432
DeKalb GA	55	0
DeKalb GA	42	0
DeKalb GA	44	2,987
DeKalb GA	40	831
DeKalb GA	41	4,079
DeKalb GA	10	0
DeKalb GA	43	4,576
Fayette GA	16	3,730
Fayette GA	34	9
Forsyth GA	27	6,673
Forsyth GA	51	3,439
Fulton GA	38	867
Fulton GA	39	0
Fulton GA	6	6,397
Fulton GA	39	0
Fulton GA	21	5,975
Fulton GA	48	46
Fulton GA	21	2,488
Fulton GA	56	0
Fulton GA	21	72
Fulton GA	48	1,344
Fulton GA	48	0
Fulton GA	56	4,390
Fulton GA	28	208
Fulton GA	35	287
Fulton GA	28	991
Fulton GA	35	0
Fulton GA	36	1,672
Fulton GA	39	0
Fulton GA	36	5
Fulton GA	39	0
Fulton GA	36	0
Fulton GA	39	914
Fulton GA	36	0
Fulton GA	39	6,508

**Political Subdivison Splits Between Districts**

Enacted Senate B-V-C

<b>County</b>	<b>District</b>	<b>Population</b>
Fulton GA	36	0
Fulton GA	39	1,815
Fulton GA	21	0
Fulton GA	48	4,079
Fulton GA	40	0
Fulton GA	56	2,120
Fulton GA	40	0
Fulton GA	56	3,258
Fulton GA	40	0
Fulton GA	56	4,302
Fulton GA	35	53
Fulton GA	39	5,294
Fulton GA	35	14,076
Fulton GA	39	7
Fulton GA	35	4,388
Fulton GA	39	3
Gordon GA	52	730
Gordon GA	54	1,950
Gwinnett GA	9	6,326
Gwinnett GA	55	0
Gwinnett GA	9	9,916
Gwinnett GA	55	0
Gwinnett GA	9	13
Gwinnett GA	41	11,832
Gwinnett GA	9	2,144
Gwinnett GA	41	597
Gwinnett GA	9	0
Gwinnett GA	55	6,264
Gwinnett GA	9	2,296
Gwinnett GA	55	3,412
Gwinnett GA	9	0
Gwinnett GA	55	4,391
Gwinnett GA	45	27
Gwinnett GA	48	9,374
Gwinnett GA	5	4,670
Gwinnett GA	9	303
Gwinnett GA	9	2,677
Gwinnett GA	45	3,198
Gwinnett GA	5	4,472
Gwinnett GA	41	4,639
Gwinnett GA	5	32
Gwinnett GA	40	8,268
Gwinnett GA	5	6,633
Gwinnett GA	48	25
Gwinnett GA	5	8,302
Gwinnett GA	40	4
Gwinnett GA	9	0



**Political Subdivison Splits Between Districts**

Enacted Senate B-V-C

<b>County</b>	<b>District</b>	<b>Population</b>
Gwinnett GA	55	6,339
Gwinnett GA	9	0
Gwinnett GA	55	7,169
Gwinnett GA	9	1,298
Gwinnett GA	45	7,338
Gwinnett GA	45	2,772
Gwinnett GA	48	0
Gwinnett GA	45	5,275
Gwinnett GA	48	0
Hall GA	49	0
Hall GA	50	1,826
Hall GA	49	9,795
Hall GA	50	4,554
Houston GA	18	7,590
Houston GA	20	6,770
Houston GA	26	1,031
Houston GA	18	3,279
Houston GA	26	169
Houston GA	18	1,964
Houston GA	20	4,561
Houston GA	26	11,273
Houston GA	18	3,577
Houston GA	20	5,541
Jackson GA	47	7,583
Jackson GA	50	16,800
Muscogee GA	15	4,114
Muscogee GA	29	5,033
Muscogee GA	15	5,139
Muscogee GA	29	2,784
Muscogee GA	15	6,170
Muscogee GA	29	1,870
Paulding GA	30	7,586
Paulding GA	31	2,162
Paulding GA	30	8,647
Paulding GA	31	5,349
Richmond GA	22	0
Richmond GA	23	1,114
Richmond GA	22	0
Richmond GA	23	2,013
Richmond GA	22	0
Richmond GA	23	4,853
Richmond GA	22	23
Richmond GA	23	3,807
Sumter GA	12	153
Sumter GA	13	2,528
Sumter GA	12	6,105
Sumter GA	13	12

**Political Subdivison Splits Between Districts**

Enacted Senate B-V-C

<b>County</b>	<b>District</b>	<b>Population</b>
Sumter GA	12	5,204
Sumter GA	13	422
Tattnall GA	4	21
Tattnall GA	19	1,671
Tattnall GA	4	1,708
Tattnall GA	19	3,368
Thomas GA	8	3,208
Thomas GA	11	11
Thomas GA	8	8
Thomas GA	11	2,823
Wilcox GA	7	1,245
Wilcox GA	13	335

RETRIEVED FROM DEMOCRACYDOCKET.COM

# EXHIBIT AF-3

RETRIEVED FROM DEMOCRACYDOCKET.COM

User:

Plan Name: GA\_2021\_House

Plan Type:

## Political Subdivision Splits Between Districts

Thursday, January 6, 2022

9:04 AM

### Split Counts

Number of subdivisions split into more than one district: Number of splits involving no population:

County	70	County	2
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Number of times a subdivision is split into multiple districts:

County	211
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Voting District	210
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County	District	Population
<i>Split Counties:</i>		
Appling GA	157	12,825
Appling GA	178	5,619
Baldwin GA	128	5,158
Baldwin GA	133	38,641
Barrow GA	104	24,245
Barrow GA	119	54,736
Barrow GA	120	4,524
Bartow GA	14	49,688
Bartow GA	15	59,213
Ben Hill GA	148	5,115
Ben Hill GA	156	12,079
Bibb GA	142	59,608
Bibb GA	143	59,469
Bibb GA	144	33,948
Bibb GA	145	4,321
Bryan GA	160	11,008
Bryan GA	164	21,420
Bryan GA	166	12,310
Bulloch GA	158	19,285
Bulloch GA	159	12,887
Bulloch GA	160	48,927
Burke GA	126	24,596
Burke GA	132	0
Carroll GA	18	18,789
Carroll GA	70	2,854
Carroll GA	71	59,538
Carroll GA	72	37,967
Catoosa GA	2	7,673
Catoosa GA	3	60,199
Chatham GA	161	28,269
Chatham GA	162	60,308
Chatham GA	163	60,123
Chatham GA	164	38,681



**Political Subdivison Splits Between Districts**

GA\_House\_DRA

<b>County</b>	<b>District</b>	<b>Population</b>
Chatham GA	165	59,978
Chatham GA	166	47,932
Cherokee GA	11	6,557
Cherokee GA	14	9,447
Cherokee GA	20	60,107
Cherokee GA	21	59,529
Cherokee GA	22	30,874
Cherokee GA	23	59,048
Cherokee GA	44	21,989
Cherokee GA	46	15,178
Cherokee GA	47	3,891
Clarke GA	120	30,095
Clarke GA	121	26,478
Clarke GA	122	59,632
Clarke GA	124	12,466
Clayton GA	75	59,743
Clayton GA	76	59,759
Clayton GA	77	59,242
Clayton GA	78	55,197
Clayton GA	79	59,500
Clayton GA	116	4,154
Cobb GA	22	28,586
Cobb GA	34	59,875
Cobb GA	35	59,889
Cobb GA	36	59,994
Cobb GA	37	59,176
Cobb GA	38	59,317
Cobb GA	39	59,381
Cobb GA	40	59,044
Cobb GA	41	60,122
Cobb GA	42	59,620
Cobb GA	43	59,464
Cobb GA	44	38,013
Cobb GA	45	59,738
Cobb GA	46	43,930
Coffee GA	169	33,736
Coffee GA	176	9,356
Columbia GA	123	2,205
Columbia GA	125	55,389
Columbia GA	127	39,526
Columbia GA	131	58,890
Cook GA	170	7,342
Cook GA	172	9,887
Coweta GA	65	13,008
Coweta GA	67	17,272
Coweta GA	70	56,267
Coweta GA	73	31,608

**Political Subdivison Splits Between Districts**

GA\_House\_DRA

<b>County</b>	<b>District</b>	<b>Population</b>
Coweta GA	136	28,003
Dawson GA	7	2,409
Dawson GA	9	24,389
DeKalb GA	52	28,300
DeKalb GA	80	59,461
DeKalb GA	81	59,007
DeKalb GA	82	59,724
DeKalb GA	83	59,416
DeKalb GA	84	59,862
DeKalb GA	85	59,373
DeKalb GA	86	59,205
DeKalb GA	87	59,709
DeKalb GA	88	47,844
DeKalb GA	89	59,866
DeKalb GA	90	59,812
DeKalb GA	91	19,700
DeKalb GA	92	15,607
DeKalb GA	93	11,690
DeKalb GA	94	31,207
DeKalb GA	95	14,599
Dougherty GA	151	6,268
Dougherty GA	152	6,187
Dougherty GA	153	59,299
Dougherty GA	154	14,036
Douglas GA	61	30,206
Douglas GA	64	35,576
Douglas GA	65	19,408
Douglas GA	66	59,047
Effingham GA	159	32,941
Effingham GA	160	0
Effingham GA	161	31,828
Fayette GA	68	29,719
Fayette GA	69	37,303
Fayette GA	73	28,428
Fayette GA	74	23,744
Floyd GA	5	5,099
Floyd GA	12	34,335
Floyd GA	13	59,150
Forsyth GA	11	19,019
Forsyth GA	24	59,011
Forsyth GA	25	46,134
Forsyth GA	26	59,248
Forsyth GA	28	50,864
Forsyth GA	100	17,007
Fulton GA	25	13,280
Fulton GA	47	55,235
Fulton GA	48	43,976

**Political Subdivison Splits Between Districts**

GA\_House\_DRA

<b>County</b>	<b>District</b>	<b>Population</b>
Fulton GA	49	59,153
Fulton GA	50	59,523
Fulton GA	51	58,952
Fulton GA	52	31,511
Fulton GA	53	59,953
Fulton GA	54	60,083
Fulton GA	55	59,971
Fulton GA	56	58,929
Fulton GA	57	59,969
Fulton GA	58	59,057
Fulton GA	59	59,434
Fulton GA	60	59,709
Fulton GA	61	29,096
Fulton GA	62	59,450
Fulton GA	63	59,381
Fulton GA	65	27,048
Fulton GA	67	41,863
Fulton GA	68	29,758
Fulton GA	69	21,379
Glynn GA	167	20,499
Glynn GA	179	59,356
Glynn GA	180	4,644
Gordon GA	5	53,738
Gordon GA	6	3,806
Grady GA	171	8,115
Grady GA	173	18,121
Gwinnett GA	30	8,620
Gwinnett GA	48	15,027
Gwinnett GA	88	11,845
Gwinnett GA	94	28,004
Gwinnett GA	95	34,221
Gwinnett GA	96	59,515
Gwinnett GA	97	59,072
Gwinnett GA	98	59,998
Gwinnett GA	99	59,850
Gwinnett GA	100	35,204
Gwinnett GA	101	59,938
Gwinnett GA	102	58,959
Gwinnett GA	103	51,691
Gwinnett GA	104	35,117
Gwinnett GA	105	59,344
Gwinnett GA	106	59,112
Gwinnett GA	107	59,702
Gwinnett GA	108	59,577
Gwinnett GA	109	59,630
Gwinnett GA	110	59,951
Gwinnett GA	111	22,685

**Political Subdivison Splits Between Districts**

GA\_House\_DRA

<b>County</b>	<b>District</b>	<b>Population</b>
Habersham GA	10	42,636
Habersham GA	32	3,395
Hall GA	27	54,508
Hall GA	28	8,108
Hall GA	29	59,200
Hall GA	30	50,646
Hall GA	31	14,349
Hall GA	100	7,819
Hall GA	103	8,506
Harris GA	138	21,634
Harris GA	139	13,034
Henry GA	74	18,397
Henry GA	78	3,847
Henry GA	91	35,569
Henry GA	115	60,174
Henry GA	116	55,759
Henry GA	117	54,737
Henry GA	118	12,229
Houston GA	145	28,132
Houston GA	146	60,203
Houston GA	147	59,178
Houston GA	148	16,120
Jackson GA	31	45,552
Jackson GA	32	10,931
Jackson GA	119	4,211
Jackson GA	120	15,213
Jasper GA	114	2,855
Jasper GA	118	11,733
Jones GA	133	20,561
Jones GA	144	7,786
Lamar GA	134	5,026
Lamar GA	135	13,474
Liberty GA	167	5,109
Liberty GA	168	60,147
Lowndes GA	174	9,770
Lowndes GA	175	43,692
Lowndes GA	176	4,797
Lowndes GA	177	59,992
Lumpkin GA	9	29,201
Lumpkin GA	27	4,287
Madison GA	33	9,935
Madison GA	123	20,185
McDuffie GA	125	4,748
McDuffie GA	128	16,884
Meriwether GA	136	13,382
Meriwether GA	137	7,231
Monroe GA	134	9,272



**Political Subdivison Splits Between Districts**

GA\_House\_DRA

<b>County</b>	<b>District</b>	<b>Population</b>
Monroe GA	144	17,498
Monroe GA	145	1,187
Muscogee GA	137	30,443
Muscogee GA	138	12,190
Muscogee GA	139	45,976
Muscogee GA	140	59,294
Muscogee GA	141	59,019
Newton GA	93	15,515
Newton GA	113	60,053
Newton GA	114	36,915
Oconee GA	120	9,150
Oconee GA	121	32,649
Paulding GA	16	16,549
Paulding GA	17	59,120
Paulding GA	18	10,627
Paulding GA	19	58,955
Paulding GA	64	23,410
Peach GA	145	14,093
Peach GA	150	13,888
Putnam GA	118	10,591
Putnam GA	124	11,456
Richmond GA	126	25,990
Richmond GA	127	19,152
Richmond GA	129	58,829
Richmond GA	130	59,203
Richmond GA	132	43,433
Rockdale GA	91	4,781
Rockdale GA	92	44,666
Rockdale GA	93	32,913
Rockdale GA	95	11,210
Spalding GA	74	16,815
Spalding GA	117	5,393
Spalding GA	134	45,098
Sumter GA	150	14,282
Sumter GA	151	15,334
Tattnall GA	156	1,263
Tattnall GA	157	21,579
Telfair GA	149	9,486
Telfair GA	156	2,991
Thomas GA	172	4,176
Thomas GA	173	41,622
Tift GA	169	6,730
Tift GA	170	34,614
Troup GA	72	10,281
Troup GA	136	17,913
Troup GA	137	16,144
Troup GA	138	25,088

**Political Subdivison Splits Between Districts**

GA\_House\_DRA

<b>County</b>	<b>District</b>	<b>Population</b>
Walker GA	1	43,415
Walker GA	2	24,239
Walton GA	111	37,324
Walton GA	112	59,349
Ware GA	174	9,097
Ware GA	176	27,154
Wayne GA	167	6,742
Wayne GA	178	23,402
White GA	8	22,119
White GA	9	5,884
Whitfield GA	2	27,861
Whitfield GA	4	59,070
Whitfield GA	6	15,933
<i>Split VTDs:</i>		
Barrow GA	104	1,708
Barrow GA	119	8,060
Bartow GA	14	15,558
Bartow GA	15	1,047
Bartow GA	14	3,335
Bartow GA	15	211
Ben Hill GA	148	5,115
Ben Hill GA	156	5,229
Bibb GA	142	2,326
Bibb GA	144	3,617
Bibb GA	142	2,369
Bibb GA	144	3,076
Bibb GA	142	0
Bibb GA	144	12,654
Bibb GA	142	4,426
Bibb GA	145	852
Bryan GA	164	1,268
Bryan GA	166	1,741
Bryan GA	164	4,552
Bryan GA	166	4,707
Bryan GA	164	3,489
Bryan GA	166	144
Bulloch GA	158	3,764
Bulloch GA	159	5,869
Burke GA	126	788
Burke GA	132	0
Carroll GA	71	410
Carroll GA	72	5,554
Carroll GA	18	2,162
Carroll GA	72	0
Carroll GA	18	0
Carroll GA	72	8,617
Chatham GA	162	2,134

**Political Subdivison Splits Between Districts**

GA\_House\_DRA

<b>County</b>	<b>District</b>	<b>Population</b>
Chatham GA	166	1,493
Chatham GA	164	5,562
Chatham GA	166	0
Chatham GA	163	2,064
Chatham GA	165	397
Chatham GA	163	0
Chatham GA	164	5,207
Chatham GA	161	5,335
Chatham GA	164	4,987
Chatham GA	162	5,096
Chatham GA	163	0
Chatham GA	162	1,177
Chatham GA	163	1,109
Chatham GA	163	785
Chatham GA	166	1,890
Cherokee GA	20	5,626
Cherokee GA	22	1,222
Cherokee GA	44	0
Cherokee GA	21	3,200
Cherokee GA	47	3,891
Cherokee GA	21	2,250
Cherokee GA	23	2,578
Clarke GA	122	2,758
Clarke GA	124	2,286
Clarke GA	121	7,082
Clarke GA	122	5,589
Clarke GA	120	1,922
Clarke GA	121	3,184
Clayton GA	75	5,018
Clayton GA	78	601
Clayton GA	78	9,099
Clayton GA	116	4,154
Clayton GA	76	1,911
Clayton GA	78	1,316
Cobb GA	35	7,322
Cobb GA	36	142
Cobb GA	22	5,226
Cobb GA	35	1,996
Cobb GA	22	4,918
Cobb GA	44	3,763
Cobb GA	38	8,476
Cobb GA	41	0
Cobb GA	42	11,055
Cobb GA	43	2,346
Cobb GA	34	700
Cobb GA	37	5,170
Cobb GA	37	2,031

**Political Subdivison Splits Between Districts**

GA\_House\_DRA

<b>County</b>	<b>District</b>	<b>Population</b>
Cobb GA	43	2,387
Cobb GA	22	599
Cobb GA	35	3,844
Cobb GA	22	0
Cobb GA	34	871
Cobb GA	35	8,631
Cobb GA	44	2,121
Cobb GA	46	2,600
Cobb GA	39	5,678
Cobb GA	40	582
Cobb GA	38	1,589
Cobb GA	39	5,513
Cobb GA	38	256
Cobb GA	39	5,427
Cobb GA	37	3,349
Cobb GA	43	6,645
Cobb GA	34	1,664
Cobb GA	37	811
Cobb GA	37	2,877
Cobb GA	43	1,457
Cobb GA	37	1,532
Cobb GA	43	3,022
Cobb GA	42	1,494
Cobb GA	43	5,417
Cobb GA	35	2,611
Cobb GA	36	559
Cobb GA	41	1,955
Cobb GA	42	5,846
Cobb GA	37	6,683
Cobb GA	41	6,305
Cobb GA	34	3,976
Cobb GA	35	0
Cobb GA	40	1,292
Cobb GA	42	5,341
Cobb GA	40	6,599
Cobb GA	42	1,609
Cobb GA	39	905
Cobb GA	40	7,690
Coffee GA	169	19,642
Coffee GA	176	8,929
Columbia GA	125	326
Columbia GA	131	5,958
Coweta GA	70	12,590
Coweta GA	73	1,521
DeKalb GA	89	2,204
DeKalb GA	90	316
DeKalb GA	85	5,454



**Political Subdivison Splits Between Districts**

GA\_House\_DRA

<b>County</b>	<b>District</b>	<b>Population</b>
DeKalb GA	86	9,300
DeKalb GA	81	5,398
DeKalb GA	83	7,691
DeKalb GA	86	1,002
DeKalb GA	87	3,088
DeKalb GA	82	2,059
DeKalb GA	84	1,221
DeKalb GA	85	1,698
DeKalb GA	86	1,064
DeKalb GA	86	2,226
DeKalb GA	87	2,547
DeKalb GA	86	3,296
DeKalb GA	94	460
DeKalb GA	87	1,419
DeKalb GA	88	1,633
DeKalb GA	94	3,736
DeKalb GA	95	1,104
DeKalb GA	84	920
DeKalb GA	91	1,271
DeKalb GA	87	1,863
DeKalb GA	88	4,069
DeKalb GA	87	1,338
DeKalb GA	88	2,865
DeKalb GA	88	2,963
DeKalb GA	94	0
DeKalb GA	87	656
DeKalb GA	88	3,960
DeKalb GA	81	2,394
DeKalb GA	88	1,635
Dougherty GA	151	4,018
Dougherty GA	153	2,465
Dougherty GA	153	1,245
Dougherty GA	154	3,972
Douglas GA	64	3,762
Douglas GA	66	0
Effingham GA	159	2,105
Effingham GA	160	0
Effingham GA	159	1,960
Effingham GA	161	959
Fayette GA	68	983
Fayette GA	73	1,392
Fayette GA	73	605
Fayette GA	74	1,646
Fayette GA	73	1,932
Fayette GA	74	2,452
Floyd GA	12	1,576
Floyd GA	13	3,847

**Political Subdivison Splits Between Districts**

GA\_House\_DRA

<b>County</b>	<b>District</b>	<b>Population</b>
Floyd GA	12	1,080
Floyd GA	13	4,509
Forsyth GA	26	10,116
Forsyth GA	28	2,801
Forsyth GA	11	7,687
Forsyth GA	28	7,982
Forsyth GA	26	4,666
Forsyth GA	28	2,410
Forsyth GA	11	11,332
Forsyth GA	24	1,335
Forsyth GA	28	333
Forsyth GA	24	3,988
Forsyth GA	26	6,597
Forsyth GA	28	7,875
Forsyth GA	24	9,868
Forsyth GA	25	0
Forsyth GA	26	15,990
Forsyth GA	25	10,064
Forsyth GA	100	11,887
Forsyth GA	26	11,718
Forsyth GA	100	5,120
Fulton GA	58	3,122
Fulton GA	59	0
Fulton GA	53	1,524
Fulton GA	60	335
Fulton GA	55	6,091
Fulton GA	57	0
Fulton GA	55	3,033
Fulton GA	60	4,105
Fulton GA	55	1,756
Fulton GA	60	4,311
Fulton GA	55	340
Fulton GA	60	3,418
Fulton GA	48	862
Fulton GA	49	2,505
Fulton GA	47	1,250
Fulton GA	49	1,304
Fulton GA	48	4,109
Fulton GA	49	281
Fulton GA	59	2,393
Fulton GA	62	2,049
Fulton GA	48	3,608
Fulton GA	51	1,792
Fulton GA	47	0
Fulton GA	49	3,818
Fulton GA	47	501
Fulton GA	49	123

**Political Subdivison Splits Between Districts**

GA\_House\_DRA

<b>County</b>	<b>District</b>	<b>Population</b>
Fulton GA	47	284
Fulton GA	49	61
Fulton GA	51	1,292
Fulton GA	53	6,066
Fulton GA	47	2,971
Fulton GA	49	4,750
Fulton GA	60	220
Fulton GA	61	773
Fulton GA	61	1,575
Fulton GA	65	2,978
Fulton GA	65	1,028
Fulton GA	67	7,728
Fulton GA	62	92
Fulton GA	68	5,255
Fulton GA	65	2,858
Fulton GA	67	1,176
Fulton GA	65	1,070
Fulton GA	67	13,013
Gwinnett GA	106	934
Gwinnett GA	110	2,651
Gwinnett GA	102	3,729
Gwinnett GA	110	2,597
Gwinnett GA	98	2,475
Gwinnett GA	108	1,991
Gwinnett GA	94	955
Gwinnett GA	108	4,255
Gwinnett GA	96	7,245
Gwinnett GA	107	5,149
Gwinnett GA	96	1,426
Gwinnett GA	99	3,389
Gwinnett GA	30	8,620
Gwinnett GA	104	1,575
Gwinnett GA	102	2,073
Gwinnett GA	105	3,924
Gwinnett GA	102	4,231
Gwinnett GA	105	7,770
Gwinnett GA	107	8,164
Gwinnett GA	109	892
Gwinnett GA	96	5,745
Gwinnett GA	97	2,561
Gwinnett GA	103	1,506
Gwinnett GA	105	7,421
Gwinnett GA	100	2,158
Gwinnett GA	103	6,421
Gwinnett GA	99	3,224
Gwinnett GA	103	2,836
Habersham GA	10	8,687

**Political Subdivision Splits Between Districts**

GA\_House\_DRA

<b>County</b>	<b>District</b>	<b>Population</b>
Habersham GA	32	1,972
Hall GA	28	3,803
Hall GA	29	4,979
Henry GA	115	0
Henry GA	116	5,686
Henry GA	115	7,135
Henry GA	116	17
Henry GA	116	5,233
Henry GA	117	8,688
Henry GA	115	0
Henry GA	117	4,121
Henry GA	78	3,847
Henry GA	116	3,999
Henry GA	78	0
Henry GA	91	7,453
Henry GA	91	3,240
Henry GA	115	1,518
Houston GA	145	69
Houston GA	147	11,815
Houston GA	146	9,734
Houston GA	147	3,595
Houston GA	145	8,748
Houston GA	147	6,643
Houston GA	146	3,947
Houston GA	147	9,547
Houston GA	145	15,867
Houston GA	146	0
Houston GA	147	1,931
Houston GA	146	13,202
Houston GA	148	7,640
Houston GA	145	0
Houston GA	147	9,118
Houston GA	146	5,586
Houston GA	148	4,039
Jackson GA	31	4,513
Jackson GA	32	10,931
Jackson GA	120	3,803
Jackson GA	31	16,656
Jackson GA	119	4,211
Jones GA	133	384
Jones GA	144	2,481
Lamar GA	134	3,043
Lamar GA	135	2,725
Liberty GA	167	5,109
Liberty GA	168	4,344
Lowndes GA	175	8,373
Lowndes GA	177	37,217



**Political Subdivison Splits Between Districts**

GA\_House\_DRA

<b>County</b>	<b>District</b>	<b>Population</b>
Lowndes GA	175	6,400
Lowndes GA	177	8,754
Lowndes GA	174	1,951
Lowndes GA	175	3,755
Lowndes GA	175	9,620
Lowndes GA	176	4,797
Lowndes GA	177	6,930
Lumpkin GA	9	29,201
Lumpkin GA	27	4,287
Muscogee GA	140	5,391
Muscogee GA	141	5,010
Muscogee GA	139	3,363
Muscogee GA	140	4,560
Muscogee GA	137	5,599
Muscogee GA	141	6,645
Muscogee GA	140	13,744
Muscogee GA	141	32
Muscogee GA	137	8,327
Muscogee GA	141	3,143
Muscogee GA	139	5,899
Muscogee GA	141	5,582
Newton GA	93	1,206
Newton GA	113	3,687
Newton GA	93	856
Newton GA	113	3,443
Newton GA	113	0
Newton GA	114	2,971
Newton GA	93	1,668
Newton GA	113	5,075
Paulding GA	18	916
Paulding GA	64	9,977
Paulding GA	16	8,392
Paulding GA	17	16
Paulding GA	17	517
Paulding GA	18	7,991
Paulding GA	19	1,240
Paulding GA	17	5,972
Paulding GA	18	1,720
Paulding GA	16	8,152
Paulding GA	17	12,810
Paulding GA	19	5,455
Paulding GA	16	5
Paulding GA	17	17,525
Richmond GA	129	954
Richmond GA	130	886
Richmond GA	127	2,362
Richmond GA	129	894

**Political Subdivison Splits Between Districts**

GA\_House\_DRA

<b>County</b>	<b>District</b>	<b>Population</b>
Richmond GA	126	0
Richmond GA	132	9,711
Richmond GA	129	3,260
Richmond GA	132	2,535
Richmond GA	127	586
Richmond GA	129	2,007
Richmond GA	127	1,164
Richmond GA	129	6,148
Richmond GA	126	0
Richmond GA	132	2,432
Richmond GA	126	2,403
Richmond GA	132	0
Rockdale GA	93	6,444
Rockdale GA	95	0
Rockdale GA	93	10,095
Rockdale GA	95	872
Rockdale GA	92	6,218
Rockdale GA	93	79
Rockdale GA	93	4,818
Rockdale GA	95	0
Spalding GA	74	235
Spalding GA	134	2,835
Spalding GA	74	2,075
Spalding GA	134	4,817
Spalding GA	74	787
Spalding GA	134	5,290
Sumter GA	150	4,568
Sumter GA	151	1,549
Sumter GA	150	5,179
Sumter GA	151	447
Troup GA	136	2,068
Troup GA	137	497
Walton GA	111	2,993
Walton GA	112	3,003
Ware GA	174	2,672
Ware GA	176	3,692
Ware GA	174	0
Ware GA	176	4,133
Ware GA	174	0
Ware GA	176	2,107
Ware GA	174	2,506
Ware GA	176	2,526
Wayne GA	167	1,928
Wayne GA	178	637
Whitfield GA	2	3,864
Whitfield GA	4	1,000
Whitfield GA	2	6,210

## Political Subdivison Splits Between Districts

GA\_House\_DRA

County	District	Population
Whitfield GA	6	2,122

RETRIEVED FROM DEMOCRACYDOCKET.COM

# EXHIBIT AG-1

RETRIEVED FROM DEMOCRACYDOCKET.COM



DISTRICT_N	LASTNAME	FIRSTNAME	PARTY	RACE	Illustrative Senate	2014 Senate	2021 Senate
1	watson	ben	r	w	001	001	001
2	jackson	lester	d	b	002	002	002
3	mcneill	sheila	r	w	003	003	003
4	hickman	billy	r	w	008	004	004
5	rahman	sheikh	d	s	005	005	005
6	jordan	jennifer	d	w	056	006	006
7	harper	tyler	r	w	020	007	013
8	goodman	russ	r	w	007	008	008
9	merritt	nikki	d	b	009	009	009
10	jones	emanuel	d	b	010	010	010
11	burke	dean	r	w	011	011	011
12	sims	freddie	d	b	012	012	012
13	summers	carden	r	w	020	013	013
14	thompson	bruce	r	w	014	014	052
15	harbison	ed	d	b	015	015	015
16	harbin	marty	r	w	028	016	016
17	strickland	brian	r	w	017	017	017
18	kennedy	john	r	w	018	018	018
19	tillery	blake	r	w	013	019	019
20	walker	larry	r	w	020	020	020
21	beach	brandon	r	w	021	021	021
22	jones	harold	d	b	022	022	022
23	burns	max	r	w	004	023	023
24	anderson	lee	r	w	024	024	024
25	jones	burt	r	w	025	025	025
26	lucas	david	d	b	026	026	026
27	dolezal	greg	r	w	027	027	027
28	brass	matt	r	w	016	028	028
29	robertson	randy	r	w	029	029	029
30	dugan	mike	r	w	030	030	030

DISTRICT_N	LASTNAME	FIRSTNAME	PARTY	RACE	Illustrative Senate	2014 Senate	2021 Senate
31	anavitarte	jason	r	h	031	031	031
32	kirkpatrick	kay	r	w	032	032	032
33	rhett	michael	d	b	006	033	033
34	seay	valencia	d	b	034	034	034
35	james	donzella	d	b	035	035	035
36	orrock	NA	d	w	036	036	036
37	tippins	lindsey	r	w	037	037	037
38	tate	horacena	d	b	038	038	038
39	halpern	sonya	d	b	039	039	039
40	harrell	sally	d	w	040	040	040
41	jackson	kim	d	b	041	041	041
42	parent	elena	d	w	042	042	042
43	anderson	tonya	d	b	043	043	043
44	davenport	gail	d	b	044	044	044
45	dixon	clint	r	w	019	045	045
46	cowsert	bill	r	w	046	046	046
47	ginn	frank	r	w	047	047	047
48	au	michelle	d	a	048	048	048
49	millar	cecil	r	w	049	049	049
50	hatchett	bo	r	w	050	050	050
51	gooch	steve	r	w	051	051	051
52	hufstetler	chuck	r	w	052	052	052
53	mullis	jeff	r	w	053	053	053
54	payne	chuck	r	w	054	054	054
55	butler	gloria	d	b	055	055	055
56	albers	john	r	w	056	056	056

# EXHIBIT AG-2

RETRIEVED FROM DEMOCRACYDOCKET.COM

DISTRICT_N	LASTNAME	FIRSTNAME	PARTY	RACE	Illustrative House	2015 House	2021 House
1	cameron	mike	r	w	1	1	1
2	tarvin	steve	r	w	2	2	2
3	hill	dewayne	r	w	3	3	3
4	carpenter	kasey	r	w	4	4	4
5	barton	matt	r	w	5	5	5
6	ridley	jason	r	w	6	6	6
7	ralston	david	r	w	7	7	7
8	gunter	stan	r	w	8	8	8
9	wade	will	r	w	9	9	9
10	anderson	victor	r	w	10	10	10
11	jasperse	rick	r	w	11	11	11
12	lumsden	eddie	r	w	12	12	12
13	dempsey	katie	r	w	13	13	13
14	scoggins	mitchell	r	w	15	14	14
15	gambill	matthew	r	w	15	15	15
16	kelley	trey	r	w	NA	NA	NA
17	montahan	martin	r	w	19	17	17
18	smith	tyler	r	w	16	18	18
19	gullett	joseph	r	w	17	19	19
20	byrd	charlice	r	w	20	20	20
21	thomas	brad	r	w	21	21	21
22	cantrell	wes	r	w	169	22	21
23	ballinger	mandi	r	w	23	23	23
24	smallwoodgi	sheri	r	w	26	24	24
25	jones	todd	r	w	25	25	25
26	mcdonald	lauren	r	w	NA	NA	NA
27	hawkins	lee	r	w	27	27	27
28	erwin	chris	r	w	28	28	32
29	dubnik	matt	r	w	29	29	29
30	dunahoo	emory	r	w	29	30	31
31	benton	tommy	r	w	31	31	31
32	powell	alan	r	w	32	32	33
33	leverett	rob	r	w	33	33	123



DISTRICT_N	LASTNAME	FIRSTNAME	PARTY	RACE	Illustrative House	2015 House	2021 House
34	reeves	bert	r	w	34	34	34
35	setzler	ed	r	w	35	35	22
36	ehrhart	ginny	r	w	36	36	36
37	williams	mary	d	w	37	37	37
38	wilkerson	david	d	b	38	38	38
39	thomas	erica	d	b	39	39	39
40	allen	erick	d	b	42	40	40
41	smith	michael	d	b	41	41	41
42	anulewicz	teri	d	w	53	42	42
43	cooper	sharon	r	w	43	43	45
44	parsons	don	r	w	44	44	44
45	dollar	matt	r	w	45	45	45
46	carson	john	r	w	46	46	46
47	jones	jan	r	w	22	47	47
48	robichaux	mary	d	w	48	48	48
49	martin	charles	r	w	49	49	49
50	kausche	angelika	d	w	50	50	50
51	mclaurin	josh	d	w	51	51	51
52	roberts	shea	d	w	52	52	54
53	jones	sheila	d	b	40	53	60
54	holland	betsy	d	w	54	54	54
55	metze	marie	d	b	55	55	55
56	mainor	mesha	d	b	56	56	56
57	evans	stacey	d	w	58	57	57
58	cannon	park	d	b	59	58	58
59	dreyer	david	d	w	57	59	62
60	schofield	kim	d	b	60	60	63
61	bruce	roger	d	b	61	61	61
62	boddie	william	d	b	62	62	62
63	bazemore	debra	d	b	63	63	69
64	jackson	derrick	d	b	64	64	68
65	thomas	mandisha	d	b	65	65	65
66	alexander	kimberly	d	b	66	66	66

DISTRICT_N	LASTNAME	FIRSTNAME	PARTY	RACE	Illustrative House	2015 House	2021 House
67	gravley	micah	r	w	150	67	19
68	collins	j	r	w	68	68	71
69	nix	randy	r	w	69	69	72
70	smith	lynn	r	w	NA	NA	NA
71	singleton	philip	r	w	71	71	67
72	bonner	josh	r	w	72	72	73
73	mathiak	karen	r	w	73	73	74
74	neal	yasmin	d	b	74	74	79
75	glanton	mike	d	b	75	75	75
76	givensscott	sandra	d	b	76	76	76
77	burnough	rhonda	d	b	77	77	77
78	douglas	demetrius	d	b	78	78	78
79	wilensky	michael	d	w	79	79	80
80	wilson	matthew	d	w	80	80	52
81	holcomb	scott	d	w	81	81	81
82	oliver	mary	d	w	82	82	82
83	evans	becky	d	w	83	83	89
84	shannon	renitta	d	b	84	84	84
85	drenner	karla	d	w	85	85	85
86	lopez	zulma	d	h	86	86	86
87	davis	viola	d	b	87	87	87
88	mittchell	billy	d	b	88	88	87
89	nguyen	bee	d	a	89	89	90
91	taylor	rhonda	d	b	93	91	92
92	carter	doreen	d	b	92	92	93
93	kendrick	darshun	d	b	91	93	95
94	bennett	karen	d	b	94	94	94
95	moore	beth	d	w	95	95	97
96	marin	pedro	d	h	96	96	96
97	rich	bonnie	r	w	97	97	100
98	clark	david	r	w	98	98	100
99	lim	marvin	d	a	99	99	98
100	mcclain	dewey	d	b	100	100	109

DISTRICT_N	LASTNAME	FIRSTNAME	PARTY	RACE	Illustrative House	2015 House	2021 House
101	park	sam	d	a	101	101	107
102	kennard	gregg	d	w	102	102	101
103	barr	timothy	r	w	103	103	101
104	efstration	chuck	r	w	104	104	104
105	mcleod	donna	d	b	105	105	105
106	mitchell	rebecca	d	w	106	106	106
107	hutchinson	shelly	d	b	107	107	106
108	clark	jasmine	d	b	108	108	108
109	lewisward	regina	d	b	90	109	115
110	crowe	clint	r	w	131	110	118
111	holly	elmahdi	d	b	109	111	116
112	belton	dave	r	w	145	112	114
113	henderson	sharon	d	b	113	113	113
114	kirby	tom	r	w	115	114	111
115	williamson	bruce	r	w	114	115	112
116	england	terry	r	w	116	116	119
117	gaines	houston	r	w	117	117	120
118	frye	spencer	d	w	118	118	122
119	wiedower	marcus	r	w	119	119	121
120	rhodes	trey	r	w	120	120	124
121	fleming	barry	r	w	121	121	125
122	lott	jodi	r	w	122	122	131
123	newton	mark	r	w	123	123	127
124	howard	henry	d	b	124	124	129
125	nelson	sheila	d	b	125	125	130
126	frazier	gloria	d	b	126	126	126
127	prince	brian	d	b	127	127	132
128	jackson	mack	d	b	128	128	132
129	holmes	susan	r	w	129	129	118
130	knight	david	r	w	110	130	134
131	camp	beth	r	w	130	131	135
132	jenkins	david	r	w	132	132	136
133	smith	vance	r	w	133	133	138

DISTRICT_N	LASTNAME	FIRSTNAME	PARTY	RACE	Illustrative House	2015 House	2021 House
134	smith	richard	r	w	134	134	139
135	smyre	calvin	d	b	135	135	140
136	hugley	carolyn	d	b	136	136	141
137	buckner	debbie	d	w	138	137	137
138	cheokas	mike	r	w	138	138	151
139	bentley	patty	d	b	139	139	150
140	dickey	robert	r	w	140	140	145
141	washburn	dale	r	w	141	141	144
142	paris	miriam	d	b	142	142	142
143	beverly	james	d	b	143	143	143
144	mathis	danny	r	w	141	144	133
145	williams	ricky	r	w	144	145	133
146	blackmon	shaw	r	w	148	146	146
147	clark	heath	r	w	147	147	147
148	williams	noel	r	w	148	148	148
149	pruitt	robert	r	w	149	149	149
150	hatchett	matt	r	w	149	150	155
151	greene	gerald	r	w	154	151	154
152	yearta	bill	r	w	152	152	152
153	whitakerhop	camia	d	b	151	153	153
154	dukes	winfred	d	b	154	154	154
155	pirkle	clay	r	w	155	155	169
156	morris	greg	r	w	156	156	156
157	werkheiser	william	r	w	157	157	157
158	parrish	butch	r	w	158	158	158
159	burns	jon	r	w	159	159	159
160	tankersley	jan	r	w	160	160	160
161	hitchens	bill	r	w	161	161	161
162	waynegillia	carl	d	b	162	162	163
163	mallow	derek	d	b	165	163	163
164	stephens	ron	r	w	164	164	164
165	stephens	mickey	d	b	NA	NA	NA
166	petrea	jesse	r	w	166	166	166



DISTRICT_N	LASTNAME	FIRSTNAME	PARTY	RACE	Illustrative House	2015 House	2021 House
167	deloach	buddy	r	w	167	167	167
168	williams	al	d	b	168	168	168
169	lariccia	dominic	r	w	176	169	176
170	houston	penny	r	w	170	170	170
171	campbell	joe	r	w	153	171	171
172	watson	sam	r	w	172	172	172
173	taylor	darlene	r	w	173	173	173
174	corbett	john	r	w	175	174	174
175	lahood	john	r	w	173	175	175
176	burchett	james	r	w	174	176	176
177	sharper	dexter	d	b	177	177	177
178	meeks	steven	r	w	178	178	178
179	hogan	don	r	w	179	179	179
180	sainz	steven	r	h	180	180	180

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# EXHIBIT BB-1

RETRIEVED FROM DEMOCRACYDOCKET.COM

User:

Plan Name: **Ga\_House\_Illustrative\_Plan**

Plan Type:

## Measures of Compactness Report

Thursday, January 6, 2022

8:39 AM

	<b>Reock</b>	<b>Polsby-Popper</b>
Mean	0.39	0.27
Min	0.16	0.11
Max	0.66	0.61
Std. Dev.	0.10	0.10
Sum		

Higher Number is Better

Lower Number is Better

<b>District</b>	<b>Reock</b>	<b>Polsby-Popper</b>
001	0.56	0.47
002	0.29	0.16
003	0.50	0.41
004	0.55	0.36
005	0.47	0.41
006	0.52	0.27
007	0.54	0.40
008	0.31	0.23
009	0.51	0.40
010	0.54	0.31
011	0.54	0.34
012	0.45	0.21
013	0.33	0.22
014	0.32	0.17
015	0.39	0.16
016	0.49	0.33

**Measures of Compactness Report**

Ga\_House\_Illustrative\_Plan

District	Higher Number is Better		Lower Number is Better	
	Reock	Polsby-Popper		
017	0.57	0.42		
018	0.32	0.18		
019	0.66	0.45		
020	0.51	0.49		
021	0.37	0.24		
022	0.43	0.37		
023	0.25	0.20		
024	0.35	0.43		
025	0.43	0.37		
026	0.61	0.54		
027	0.51	0.23		
028	0.33	0.24		
029	0.28	0.19		
030	0.36	0.24		
031	0.51	0.34		
032	0.56	0.42		
033	0.24	0.17		
034	0.31	0.17		
035	0.32	0.24		
036	0.33	0.14		
037	0.28	0.11		
038	0.35	0.25		
039	0.28	0.21		
040	0.33	0.13		
041	0.24	0.12		
042	0.36	0.17		
043	0.45	0.22		
044	0.52	0.32		
045	0.36	0.26		
046	0.60	0.42		



**Measures of Compactness Report**

Ga\_House\_Illustrative\_Plan

District	Higher Number is Better		Lower Number is Better	
	Reock	Polsby-Popper		
047	0.25	0.21		
048	0.40	0.30		
049	0.25	0.19		
050	0.35	0.20		
051	0.39	0.40		
052	0.40	0.39		
053	0.25	0.13		
054	0.37	0.43		
055	0.21	0.14		
056	0.40	0.36		
057	0.47	0.34		
058	0.49	0.61		
059	0.32	0.20		
060	0.38	0.28		
061	0.33	0.23		
062	0.33	0.20		
063	0.27	0.23		
064	0.35	0.20		
065	0.34	0.21		
066	0.31	0.25		
067	0.30	0.18		
068	0.34	0.23		
069	0.61	0.26		
070	0.46	0.34		
071	0.43	0.28		
072	0.45	0.25		
073	0.44	0.20		
074	0.34	0.26		
075	0.29	0.15		
076	0.46	0.34		

**Measures of Compactness Report**

Ga\_House\_Illustrative\_Plan

District	Higher Number is Better		Lower Number is Better	
	Reock	Polsby-Popper		
077	0.54	0.40		
078	0.36	0.24		
079	0.55	0.44		
080	0.51	0.34		
081	0.47	0.28		
082	0.27	0.22		
083	0.16	0.11		
084	0.29	0.18		
085	0.22	0.16		
086	0.21	0.15		
087	0.44	0.27		
088	0.26	0.14		
089	0.29	0.24		
090	0.29	0.13		
091	0.36	0.15		
092	0.47	0.24		
093	0.24	0.14		
094	0.47	0.24		
095	0.36	0.30		
096	0.32	0.34		
097	0.34	0.23		
098	0.38	0.30		
099	0.40	0.45		
100	0.37	0.49		
101	0.37	0.32		
102	0.57	0.51		
103	0.28	0.22		
104	0.47	0.29		
105	0.36	0.26		
106	0.36	0.27		

**Measures of Compactness Report**

Ga\_House\_Illustrative\_Plan

District	Higher Number is Better		Lower Number is Better	
	Reock	Polsby-Popper		
107	0.40	0.29		
108	0.39	0.23		
109	0.18	0.13		
110	0.44	0.24		
111	0.30	0.23		
112	0.52	0.26		
113	0.53	0.26		
114	0.36	0.25		
115	0.49	0.36		
116	0.46	0.34		
117	0.29	0.15		
118	0.50	0.29		
119	0.38	0.23		
120	0.51	0.28		
121	0.55	0.28		
122	0.42	0.31		
123	0.21	0.17		
124	0.50	0.36		
125	0.48	0.19		
126	0.26	0.20		
127	0.26	0.21		
128	0.37	0.20		
129	0.38	0.22		
130	0.49	0.25		
131	0.55	0.46		
132	0.46	0.22		
133	0.39	0.33		
134	0.30	0.29		
135	0.49	0.47		
136	0.41	0.25		

**Measures of Compactness Report**

Ga\_House\_Illustrative\_Plan

District	Higher Number is Better		Lower Number is Better	
	Reock	Polsby-Popper		
137	0.39	0.33		
138	0.30	0.14		
139	0.37	0.26		
140	0.31	0.21		
141	0.49	0.41		
142	0.44	0.27		
143	0.49	0.30		
144	0.31	0.16		
145	0.27	0.14		
146	0.43	0.30		
147	0.46	0.24		
148	0.41	0.20		
149	0.35	0.18		
150	0.31	0.28		
151	0.34	0.27		
152	0.25	0.17		
153	0.28	0.19		
154	0.53	0.38		
155	0.38	0.22		
156	0.53	0.26		
157	0.17	0.13		
158	0.41	0.16		
159	0.36	0.21		
160	0.37	0.26		
161	0.44	0.19		
162	0.42	0.28		
163	0.45	0.56		
164	0.36	0.20		
165	0.31	0.22		
166	0.50	0.29		



**Measures of Compactness Report**

Ga\_House\_Illustrative\_Plan

District	Higher Number is Better		Lower Number is Better	
	Reock	Polsby-Popper		
167	0.40	0.24		
168	0.22	0.26		
169	0.48	0.27		
170	0.63	0.35		
171	0.43	0.45		
172	0.46	0.42		
173	0.34	0.27		
174	0.46	0.23		
175	0.32	0.24		
176	0.48	0.26		
177	0.36	0.39		
178	0.49	0.29		
179	0.34	0.27		
180	0.51	0.33		

RETRIEVED FROM DEMOCRACYDOCKET.COM

## Measures of Compactness Report

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Ga\_House\_Illustrative\_Plan

### Measures of Compactness Summary

<b>Reock</b>	The measure is always between 0 and 1, with 1 being the most compact.
<b>Polsby-Popper</b>	The measure is always between 0 and 1, with 1 being the most compact.

RETRIEVED FROM DEMOCRACYDOCKET.COM

# EXHIBIT BB-2

RETRIEVED FROM DEMOCRACYDOCKET.COM

User:

Plan Name: 2015 Benchmark Plan

Plan Type: House

## Measures of Compactness Report

Thursday, January 6, 2022

8:35 AM

	Reock	Polsby-Popper
Mean	0.39	0.27
Min	0.13	0.09
Max	0.63	0.54
Std. Dev.	0.11	0.10
Sum		

Higher Number is Better

Lower Number is Better

District	Reock	Polsby-Popper
1	0.51	0.43
2	0.54	0.29
3	0.41	0.42
4	0.62	0.26
5	0.46	0.26
6	0.60	0.39
7	0.62	0.50
8	0.30	0.21
9	0.41	0.39
10	0.52	0.32
11	0.28	0.19
12	0.48	0.28
13	0.45	0.19
14	0.27	0.23
15	0.54	0.54
16	0.50	0.35



**Measures of Compactness Report**

Enacted House B-V-C

District	Higher Number is Better		Lower Number is Better	
	Reock	Polsby-Popper		
17	0.41	0.45		
18	0.43	0.31		
19	0.28	0.34		
20	0.42	0.38		
21	0.33	0.16		
22	0.43	0.19		
23	0.40	0.22		
24	0.62	0.40		
25	0.43	0.27		
26	0.42	0.28		
27	0.59	0.22		
28	0.44	0.35		
29	0.41	0.22		
30	0.25	0.24		
31	0.52	0.50		
32	0.54	0.47		
33	0.24	0.13		
34	0.59	0.38		
35	0.42	0.34		
36	0.44	0.30		
37	0.27	0.16		
38	0.39	0.29		
39	0.28	0.26		
40	0.29	0.19		
41	0.48	0.34		
42	0.52	0.33		
43	0.45	0.29		
44	0.37	0.31		
45	0.46	0.30		
46	0.49	0.51		

**Measures of Compactness Report**

Enacted House B-V-C

District	Higher Number is Better		Lower Number is Better	
	Reock	Polsby-Popper		
47	0.38	0.20		
48	0.39	0.26		
49	0.45	0.18		
50	0.36	0.43		
51	0.40	0.42		
52	0.37	0.34		
53	0.45	0.26		
54	0.40	0.34		
55	0.16	0.12		
56	0.20	0.20		
57	0.14	0.12		
58	0.16	0.12		
59	0.23	0.20		
60	0.44	0.13		
61	0.25	0.15		
62	0.21	0.13		
63	0.16	0.12		
64	0.31	0.21		
65	0.45	0.39		
66	0.33	0.28		
67	0.40	0.31		
68	0.49	0.32		
69	0.40	0.37		
70	0.51	0.24		
71	0.44	0.28		
72	0.57	0.32		
73	0.40	0.15		
74	0.39	0.28		
75	0.32	0.22		
76	0.49	0.35		

**Measures of Compactness Report**

Enacted House B-V-C

District	Higher Number is Better		Lower Number is Better	
	Reock	Polsby-Popper		
77	0.55	0.51		
78	0.30	0.21		
79	0.54	0.52		
80	0.21	0.20		
81	0.32	0.17		
82	0.30	0.20		
83	0.14	0.12		
84	0.13	0.09		
85	0.33	0.21		
86	0.23	0.12		
87	0.20	0.14		
88	0.22	0.17		
89	0.29	0.27		
90	0.35	0.16		
91	0.34	0.29		
92	0.23	0.24		
93	0.27	0.34		
94	0.25	0.16		
95	0.40	0.40		
96	0.25	0.32		
97	0.29	0.26		
98	0.43	0.33		
99	0.42	0.36		
100	0.55	0.51		
101	0.36	0.21		
102	0.41	0.33		
103	0.30	0.22		
104	0.38	0.31		
105	0.37	0.24		
106	0.34	0.20		

**Measures of Compactness Report**

Enacted House B-V-C

District	Higher Number is Better		Lower Number is Better	
	Reock	Polsby-Popper		
107	0.53	0.31		
108	0.38	0.26		
109	0.26	0.15		
110	0.40	0.15		
111	0.32	0.12		
112	0.41	0.26		
113	0.45	0.25		
114	0.25	0.21		
115	0.58	0.52		
116	0.43	0.37		
117	0.41	0.20		
118	0.34	0.32		
119	0.43	0.24		
120	0.35	0.26		
121	0.58	0.18		
122	0.52	0.42		
123	0.33	0.18		
124	0.46	0.25		
125	0.49	0.23		
126	0.45	0.34		
127	0.29	0.26		
128	0.53	0.23		
129	0.49	0.32		
130	0.44	0.23		
131	0.53	0.38		
132	0.36	0.21		
133	0.42	0.25		
134	0.32	0.23		
135	0.26	0.17		
136	0.26	0.21		



**Measures of Compactness Report**

Enacted House B-V-C

District	Higher Number is Better		Lower Number is Better	
	Reock	Polsby-Popper		
137	0.41	0.23		
138	0.33	0.27		
139	0.39	0.28		
140	0.42	0.20		
141	0.43	0.27		
142	0.57	0.31		
143	0.54	0.36		
144	0.57	0.27		
145	0.44	0.31		
146	0.29	0.24		
147	0.39	0.23		
148	0.43	0.25		
149	0.62	0.32		
150	0.53	0.27		
151	0.49	0.41		
152	0.35	0.31		
153	0.35	0.30		
154	0.24	0.20		
155	0.45	0.36		
156	0.51	0.28		
157	0.28	0.20		
158	0.52	0.38		
159	0.38	0.24		
160	0.51	0.37		
161	0.46	0.25		
162	0.37	0.15		
163	0.29	0.17		
164	0.43	0.29		
165	0.26	0.13		
166	0.43	0.31		

**Measures of Compactness Report**

Enacted House B-V-C

District	Higher Number is Better		Lower Number is Better	
	Reock	Polsby-Popper		
167	0.39	0.25		
168	0.24	0.27		
169	0.37	0.31		
170	0.63	0.36		
171	0.30	0.24		
172	0.29	0.18		
173	0.36	0.29		
174	0.28	0.16		
175	0.58	0.41		
176	0.30	0.20		
177	0.45	0.31		
178	0.59	0.30		
179	0.34	0.24		
180	0.30	0.20		

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## Measures of Compactness Report

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Enacted House B-V-C

### Measures of Compactness Summary

<b>Reock</b>	The measure is always between 0 and 1, with 1 being the most compact.
<b>Polsby-Popper</b>	The measure is always between 0 and 1, with 1 being the most compact.

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# EXHIBIT BB-3

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User:

Plan Name: GA\_House\_2021 Plan

Plan Type:

## Measures of Compactness Report

Thursday, January 6, 2022

8:31 AM

	Reock	Polsby-Popper
Mean	0.39	0.28
Min	0.12	0.10
Max	0.66	0.59
Std. Dev.	0.11	0.10
Sum		

Higher Number is Better

Lower Number is Better

District	Reock	Polsby-Popper
1	0.53	0.45
2	0.53	0.24
3	0.50	0.41
4	0.37	0.21
5	0.43	0.25
6	0.45	0.26
7	0.62	0.50
8	0.46	0.27
9	0.47	0.30
10	0.34	0.30
11	0.31	0.26
12	0.47	0.31
13	0.47	0.19
14	0.32	0.23
15	0.55	0.33
16	0.31	0.35

**Measures of Compactness Report**

GA\_House\_DRA

District	Higher Number is Better		Lower Number is Better	
	Reock	Polsby-Popper		
17	0.28	0.21		
18	0.41	0.25		
19	0.26	0.26		
20	0.46	0.45		
21	0.26	0.27		
22	0.28	0.22		
23	0.40	0.19		
24	0.35	0.30		
25	0.39	0.31		
26	0.27	0.26		
27	0.60	0.34		
28	0.38	0.35		
29	0.34	0.21		
30	0.43	0.30		
31	0.44	0.25		
32	0.39	0.33		
33	0.49	0.37		
34	0.45	0.33		
35	0.32	0.24		
36	0.32	0.23		
37	0.45	0.28		
38	0.59	0.58		
39	0.59	0.40		
40	0.49	0.29		
41	0.60	0.40		
42	0.40	0.21		
43	0.42	0.22		
44	0.31	0.29		
45	0.41	0.32		
46	0.55	0.47		

**Measures of Compactness Report**

GA\_House\_DRA

District	Higher Number is Better		Lower Number is Better	
	Reock	Polsby-Popper		
47	0.29	0.21		
48	0.34	0.19		
49	0.30	0.16		
50	0.42	0.46		
51	0.54	0.36		
52	0.48	0.35		
53	0.16	0.14		
54	0.37	0.45		
55	0.18	0.16		
56	0.26	0.23		
57	0.57	0.59		
58	0.13	0.13		
59	0.12	0.11		
60	0.19	0.15		
61	0.25	0.20		
62	0.16	0.10		
63	0.16	0.14		
64	0.37	0.36		
65	0.46	0.17		
66	0.36	0.25		
67	0.36	0.12		
68	0.32	0.17		
69	0.40	0.25		
70	0.45	0.23		
71	0.44	0.35		
72	0.42	0.23		
73	0.28	0.20		
74	0.50	0.25		
75	0.42	0.28		
76	0.53	0.51		

**Measures of Compactness Report**

GA\_House\_DRA

District	Higher Number is Better		Lower Number is Better	
	Reock	Polsby-Popper		
77	0.40	0.21		
78	0.21	0.19		
79	0.50	0.21		
80	0.38	0.42		
81	0.47	0.40		
82	0.49	0.30		
83	0.34	0.36		
84	0.25	0.20		
85	0.36	0.32		
86	0.17	0.17		
87	0.26	0.24		
88	0.26	0.20		
89	0.14	0.10		
90	0.36	0.29		
91	0.45	0.20		
92	0.36	0.20		
93	0.26	0.11		
94	0.31	0.15		
95	0.44	0.25		
96	0.18	0.21		
97	0.28	0.24		
98	0.42	0.52		
99	0.36	0.29		
100	0.34	0.29		
101	0.53	0.46		
102	0.56	0.35		
103	0.33	0.24		
104	0.28	0.25		
105	0.34	0.28		
106	0.66	0.50		



**Measures of Compactness Report**

GA\_House\_DRA

District	Higher Number is Better		Lower Number is Better	
	Reock	Polsby-Popper		
107	0.51	0.32		
108	0.43	0.32		
109	0.39	0.28		
110	0.36	0.33		
111	0.33	0.29		
112	0.62	0.52		
113	0.50	0.32		
114	0.51	0.28		
115	0.44	0.23		
116	0.41	0.28		
117	0.41	0.28		
118	0.35	0.22		
119	0.39	0.21		
120	0.44	0.25		
121	0.43	0.30		
122	0.48	0.43		
123	0.30	0.18		
124	0.44	0.23		
125	0.41	0.17		
126	0.52	0.41		
127	0.35	0.20		
128	0.60	0.32		
129	0.48	0.25		
130	0.51	0.25		
131	0.38	0.28		
132	0.27	0.30		
133	0.55	0.42		
134	0.33	0.23		
135	0.57	0.42		
136	0.54	0.26		

**Measures of Compactness Report**

GA\_House\_DRA

District	Higher Number is Better		Lower Number is Better	
	Reock	Polsby-Popper		
137	0.33	0.16		
138	0.33	0.20		
139	0.28	0.23		
140	0.29	0.19		
141	0.26	0.20		
142	0.35	0.23		
143	0.50	0.30		
144	0.51	0.32		
145	0.38	0.19		
146	0.26	0.19		
147	0.33	0.26		
148	0.44	0.24		
149	0.32	0.22		
150	0.44	0.28		
151	0.53	0.22		
152	0.40	0.30		
153	0.30	0.30		
154	0.41	0.33		
155	0.49	0.48		
156	0.23	0.20		
157	0.32	0.19		
158	0.48	0.33		
159	0.34	0.22		
160	0.49	0.37		
161	0.51	0.31		
162	0.37	0.21		
163	0.27	0.17		
164	0.30	0.17		
165	0.23	0.16		
166	0.43	0.36		

**Measures of Compactness Report**

GA\_House\_DRA

District	Higher Number is Better		Lower Number is Better	
	Reock	Polsby-Popper		
167	0.42	0.19		
168	0.24	0.26		
169	0.28	0.23		
170	0.53	0.34		
171	0.35	0.37		
172	0.44	0.32		
173	0.57	0.38		
174	0.41	0.24		
175	0.47	0.37		
176	0.34	0.16		
177	0.43	0.34		
178	0.48	0.22		
179	0.45	0.42		
180	0.61	0.40		

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## Measures of Compactness Report

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GA\_House\_DRA

### Measures of Compactness Summary

<b>Reock</b>	The measure is always between 0 and 1, with 1 being the most compact.
<b>Polsby-Popper</b>	The measure is always between 0 and 1, with 1 being the most compact.

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# **COOPER EXHIBIT CD**

**To be submitted to  
Hon. Steve C. Jones via courier**

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# EXHIBIT B

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**Preliminary Report on the Newly Enacted Georgia State House and Senate Plans**  
**Dr. Lisa Handley**

**I. Introduction**

**Summary Conclusion** Voting in the six areas of Georgia that I studied for this project is racially polarized. This polarization impedes the ability of Black voters to elect candidates of their choice unless districts are drawn that provide Black voters with an opportunity to elect their preferred candidates to the state legislature. As demonstrated by illustrative state house and state senate plans, the newly enacted state legislative plans (Enacted State House Plan and Enacted State Senate Plan) fail to offer Black voters an opportunity to elect their preferred candidates in areas of the state where voting is racially polarized and where majority Black opportunity districts could have been created. The failure of the Enacted Plans to provide more Black opportunity districts dilutes the opportunity of Black voters to participate in the electoral process and to elect candidates of their choice to the Georgia state legislature.

**Scope of Project** I was retained by plaintiffs in this case as an expert to conduct an analysis of voting patterns by race in several areas in the State of Georgia to determine whether voting in these areas is racially polarized. In addition, I was asked to assess the ability of Black voters to elect their candidates of choice in these areas of the Enacted Plans compared to the illustrative plans (Illustrative State House and Illustrative State Senate Plan) drawn by plaintiffs' expert demographer, Bill Cooper, in this litigation.<sup>1</sup>

**II. Professional Background and Experience**

I have over thirty-five years of experience as a voting rights and redistricting expert. I have advised scores of jurisdictions and other clients on minority voting rights and redistricting-related issues. I have served as an expert in dozens of voting rights cases. My clients have included state and local jurisdictions, independent redistricting commissions (Arizona, Colorado, Michigan), the U.S. Department of Justice, national civil rights organizations, and such international organizations as the United Nations.

I have been actively involved in researching, writing, and teaching on subjects relating to voting rights, including minority representation, electoral system design, and redistricting. I co-

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<sup>1</sup> I am being compensated at a rate of \$300 an hour for work on this project.

authored a book, *Minority Representation and the Quest for Voting Equality* (Cambridge University Press, 1992), and co-edited a volume, *Redistricting in Comparative Perspective* (Oxford University Press, 2008), on these subjects. In addition, my research on these topics has appeared in peer-reviewed journals such as *Journal of Politics*, *Legislative Studies Quarterly*, *American Politics Quarterly*, *Journal of Law and Politics*, and *Law and Policy*, as well as law reviews (e.g., *North Carolina Law Review*) and a number of edited books. I hold a Ph.D. in political science from The George Washington University.

I have been a principal of Frontier International Electoral Consulting since co-founding the company in 1998. Frontier IEC specializes in providing electoral assistance in transitional democracies and post-conflict countries. In addition, I am a Visiting Research Academic at Oxford Brookes University in Oxford, United Kingdom. Attached to the end of this report as *Appendix D* is a copy of my curriculum vitae.

### **III. Analysis of Voting Patterns by Race**

An analysis of voting patterns by race serves as the foundation of two of the three elements of the “results test” as outlined in *Thornburg v. Gingles*: a racial bloc voting analysis is needed to determine whether the minority group is politically cohesive; and the analysis is required to determine if whites are voting sufficiently as a bloc to usually defeat the candidates preferred by minority voters. The voting patterns of white and minority voters must be estimated using statistical techniques because direct information about the race of the voters is not, of course, available on the ballots cast.

To carry out an analysis of voting patterns by race, an aggregate level database must be constructed, usually employing election precincts as the units of observation. Information relating to the demographic composition and election results in these precincts is collected, combined, and statistically analyzed to determine if there is a relationship between the racial composition of the precincts and support for specific candidates across the precincts.

***Standard Statistical Techniques*** Three standard statistical techniques have been developed over time to estimate vote choices by race: homogeneous precinct analysis, ecological



regression, and ecological inference.<sup>2</sup> Two of these analytic procedures – homogeneous precinct analysis and ecological regression – were employed by the plaintiffs’ expert in *Thornburg v. Gingles*, have the benefit of the Supreme Court’s approval in that case, and have been used in most subsequent voting rights cases. The third technique, ecological inference, was developed after the *Gingles* decision and was designed, in part, to address some of the disadvantages associated with ecological regression analysis. Ecological inference analysis has been introduced and accepted in numerous district court proceedings.

*Homogeneous precinct* (HP) analysis is the simplest technique. It involves comparing the percentage of votes received by each of the candidates in precincts that are racially or ethnically homogeneous. The general practice is to label a precinct as homogeneous if at least 90 percent of the voters or voting age population is composed of a single race. In fact, the homogeneous results reported are not estimates – they are the actual precinct results. However, most voters in Georgia do not reside in homogeneous precincts and voters who reside in homogeneous precincts may not be representative of voters who live in more racially diverse precincts. For this reason, I refer to these percentages as estimates.

The second statistical technique employed, *ecological regression* (ER), uses information from all precincts, not simply the homogeneous ones, to derive estimates of the voting behavior of minorities and whites. If there is a strong linear relationship across precincts between the percentage of minorities and the percentage of votes cast for a given candidate, this relationship can be used to estimate the percentage of minority voters supporting the candidate.

The third technique, *ecological inference* (EI), was developed by Professor Gary King. This approach also uses information from all precincts but, unlike ecological regression, it does not rely on an assumption of linearity. Instead, it incorporates maximum likelihood statistics to produce estimates of voting patterns by race. In addition, it utilizes the method of bounds, which uses more of the available information from the precinct returns as well as providing more

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<sup>2</sup> For a detailed explanation of homogeneous precinct analysis and ecological regression see Bernard Grofman, Lisa Handley and Richard Niemi, *Minority Representation and the Quest for Voting Equality* (Cambridge University Press, 1992). See Gary King, *A Solution to the Ecological Inference Problem* (Princeton University Press, 1997) for a more detailed explanation of ecological inference.

information about the voting behavior being estimated.<sup>3</sup> Unlike ecological regression, which can produce percentage estimates of less than 0 or more than 100 percent, ecological inference was designed to produce only estimates that fall within the possible limits. However, EI does not guarantee that the estimates for all of the candidates add to 100 percent for each of the racial groups examined.

**Database** To analyze voting patterns by race using aggregate level information, a database that combines election results with demographic information is required. This database is almost always constructed using election precincts as the unit of analysis. The demographic composition of the precincts is based on voter registration or turnout by race if this information is available; if it is not, then voting age population or citizen voting age population is used. Georgia collects voter registration data by race, and the 2016, 2018, and 2020 reports of turnout counts by race and ethnicity were obtained from the Georgia Secretary of State's office for inclusion in the database.

To build the Georgia dataset used for this racial bloc voting analysis, 2016, 2018, and 2020 precinct-level shapefiles were acquired from the Voting and Election Science Team. These shapefiles were joined to precinct-level election returns from the Georgia Secretary of State's office, which were processed and cleaned by OpenElections. The 2020 Census Block shapefiles, and total and voting age populations by race and ethnicity, were obtained from the Census FTP portal.

The election returns for the 2016, 2018, and 2020 election cycles were disaggregated down to the level of the 2020 Census block. This block-level dataset was then reaggregated up to the level of the 2020 voting districting, taking into account splits of the voting districts by the implemented and proposed plans.

Plan comparisons were made using the Georgia newly enacted state senate and house plans, which were acquired as census block equivalency files. The Illustrative state house and senate files were obtained from plaintiffs' expert demographer, Bill Cooper, also as census block equivalency files.

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<sup>3</sup> The following is an example of how the method of bounds works: if a given precinct has 100 voters, of whom 75 are Black and 25 are white, and the Black candidate received 80 votes, then at least 55 of the Black voters voted for the Black candidate and at most all 75 did. (The method of bounds is less useful for calculating estimates for white voters, as anywhere between none of the whites and all of the whites could have voted for the candidate.)

***Statewide elections analyzed*** All recent statewide election contests that included Black candidates were analyzed.<sup>4</sup> The general elections included the 2021 Special U.S. Senate runoff, the 2020 U.S. Senate Special general election, and the 2018 general election contests for Governor, Commissioner of Insurance, and School Superintendent. I also analyzed recent statewide Democratic primaries that included Black candidates, including the 2018 Democratic primaries for Governor, Lieutenant Governor, Commissioner of Insurance, School Superintendent, and Commissioner of Labor. Republican primaries were not examined because the overwhelming majority of Black voters who participate in primaries cast their ballots in Democratic rather than Republican primaries. As a consequence, Democratic primaries are far more probative than Republican primaries in ascertaining the candidates preferred by Black voters.<sup>5</sup>

***Geographic areas analyzed*** I examined voting patterns in six areas of Georgia where the Illustrative Plans offer districts with majority Black voting age populations (BVAP),<sup>6</sup> that the Enacted Plans fail to provide. Although the Illustrative Plans offers more majority Black state senate and state house districts than the seven found in the six regions discussed below,<sup>7</sup> my analysis focuses on these six areas because the majority Black districts in these areas are readily identifiable as “additional” when portions of the Enacted and Illustrative districts are compared. The six areas of interest, the set of Illustrative and Enacted districts being compared in each of

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<sup>4</sup> In addition to the five recent general election contests that included Black candidates, I analyzed the two contests in which Jon Ossoff ran – the 2021 runoff for U.S. Senate and the November 2020 general election for U.S. Senate.

<sup>5</sup> In addition, producing reliable estimates for Black voters in Republican primaries would not have been possible.

<sup>6</sup> Black voting age population has been calculated by counting all persons who are 18 or older who checked “Black or African American” on their census form. This includes persons who are single-race Black or any part Black (i.e., persons of two or more races who indicate “Black” as one of the races), including Hispanic Black.

<sup>7</sup> The Enacted Plans create 14 majority Black VAP state senate districts and 49 majority Black VAP state house districts. The Illustrative Plans create 19 majority Black VAP state senate districts and 54 majority Black VAP state house districts.

these areas, and the counties encompassed by these areas,<sup>8</sup> are listed in Table 1. The additional majority Black districts offered in each area by the Illustrative Plans are bolded.

**Table 1: Georgia Areas of Interest Analyzed**

<b>Area of Interest</b>	<b>Illustrative Districts</b>	<b>Enacted Districts</b>	<b>Counties</b>
<b>State Senate Districts</b>			
Eastern Atlanta Metro Region (Map 1)	10 <b>17</b> 43	10 17 43	Dekalb, Henry, Morgan, Newton, Rockdale, Walton
Southern Atlanta Metro Region (Map 2)	16 <b>28</b> 34 44	16 28 34 44	Clayton, Coweta, Douglas, Fayette, Heard, Henry, Lamar, Meriwether, Pike, Spalding, Upson
East Central Georgia with Augusta (Map 3)	22 <b>23</b> 25 26	22 23 25 26	Baldwin, Bibb, Burke, Butts, Columbia, Emanuel, Glascock, Hancock, Henry, Houston, Jasper, Jefferson, Jenkins, Johnson, Jones, McDuffie, Macon, Morgan, Peach, Putnam, Richmond, Screven, Taliaferro, Twiggs, Walton, Warren, Washington, Wilkinson
<b>State House Districts</b>			
Southeastern Atlanta Metro Region (Map 4)	<b>73</b> 75 78 109 <b>110</b> 111 129 131	74 75 78 115 116 117 118 134	Butts, Clayton, Fayette, Henry, Jasper, Lamar, Monroe, Newton, Putnam, Spalding

<sup>8</sup> All counties that overlapped any of the Illustrative or Enacted districts in the area were included in the analysis unless the county is very large (population over 500,000) and less than 10% of the county's population is encompassed by an Illustrative or Enacted district in the area.



Central Georgia (Map 5)	120	124	Baldwin, Burke, Clarke, Glascock, Greene, Hancock, Jefferson, Johnson, Jones, Laurens, McDuffie, Morgan, Oglethorpe, Putnam, Taliaferro, Walton, Warren, Washington, Wilkes, Wilkinson
	128	128	
	<b>144</b>	133	
	145	155	
Southwest Georgia (Map 6)	151	151	Brooks, Chattahoochee, Decatur, Dougherty, Grady, Lee, Lowndes, Marion, Mitchell, Schley, Seminole, Stewart, Sumter, Terrell, Thomas, Webster, Worth
	<b>153</b>	152	
	171	153	
	173	171	

#### IV. Findings

*Voting is racially polarized in the six areas of Georgia I examined* Voting is racially polarized in the six areas of Georgia that I examined. In all seven recent general elections I analyzed, Black voters were cohesive in supporting their preferred candidates and the white voters' bloc voted against these candidates. The average percentage of the white vote for Black-preferred Black candidates is no higher than 13.8% in these six areas (13.8% is the average white vote for Raphael Warnock in 2021 across the six areas).

Recent Democratic primaries that included Black candidates were also consistently racially polarized in all six areas. The only regular exceptions to this were the two recent Democratic primaries in which Black voters supported white candidates (Jon Ossoff in the 2020 primary for U.S. Senate and Jim Barksdale in his bid for the Democratic nomination for U.S. Senate in 2016). The estimates of Black and white voting patterns for these statewide general and Democratic primaries can be found in *Appendix A*.

My examination of voting patterns in these areas also included state legislative elections. A state legislative contest was analyzed if the previously existing state house or state senate district was wholly contained within one of the areas or overlapped with the additional majority Black Illustrative district(s) in an area. In addition, I looked only at biracial contests (that is, contests that included both Black and white candidates). There were eight recent state senate contests and 16 state house contests that met these criteria. All 24 of these state legislative elections were racially polarized. None of the Black candidates competing in the state senate contest analyzed garnered as much as 8% of the white vote – the average over the eight contests was only 4.6%. Black candidates fared slightly better in the state house contests, averaging 9.4% of the white vote. The

only Black candidates to win were the candidates who ran in majority Black state legislative districts.

The estimates of Black and white voting patterns for the state legislative election contests analyzed can be found in *Appendix B*.

***The Previous Plans failed to provide Black voters with opportunities to elect their preferred candidates that the Illustrative Plans would provide*** Legislative districts in the previous plans located in the same areas as the additional Illustrative majority Black districts failed to provide Black voters with an opportunity to elect their candidates of choice in past state legislative elections. Table 2 lists the previous state senate and house districts that overlap with the additional majority Black districts offered by the Illustrative Plans. A previous district must incorporate at least 5% of the Illustrative district to be included in the table, and the percentage of the Illustrative district included is specified. The shaded districts are the previous districts I have used as comparison districts – they are almost always the previous districts with the largest overlap with the additional majority Black Illustrative districts.

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**Table 2: Overlap of Additional Illustrative State Legislative Districts with  
Previous State Legislative Districts**

<b>Illustrative State Senate Plan</b>	<b>Previous State Senate Plan</b>	<b>% of Illustrative District in Previous District</b>	<b>BVAP %</b>		<b>Illustrative State House Plan</b>	<b>Previous State House Plan</b>	<b>% of Illustrative District in Previous District</b>	<b>BVAP %</b>
017	010	17.6%	74.98%		073	063	13.6%	71.31%
017	017	53.7%	41.72%		073	073	38.0%	35.12%
017	043	28.5%	68.74%		073	075	6.4%	74.27%
					073	078	41.8%	68.59%
023	022	13.4%	58.76%					
023	023	30.3%	35.62%		110	073	19.4%	35.12%
023	025	22.7%	28.50%		110	111	23.1%	51.56%
023	026	29.5%	60.14%		110	130	57.5%	36.30%
028	016	40.7%	22.00%		144	120	12.6%	26.62%
028	034	27.7%	68.34%		144	128	23.6%	54.62%
028	044	31.6%	72.43%		144	144	15.0%	27.24%
					144	145	48.8%	38.94%
					153	153	33.4%	65.15%
					153	171	36.1%	38.61%
					153	172	8.1%	27.69%
					153	173	21.4%	35.38%

According to Table 2, Illustrative senate district 17 overlaps the most with Previous state senate district 17. Previous state senate district 17, with a BVAP of 41.72%, did not elect state senators that were the candidates of choice of Black voters. In 2016, Richard Jeffares won the seat with overwhelming support from white voters and virtually no support from Black voters. Brian Strickland's election in 2018 followed the same pattern: nearly all of the white voters cast their vote for him and virtually none of the Black voters did so. The estimates for these two contests can be found in Appendix B.<sup>9</sup>

<sup>9</sup> The 2020 election is not included in Appendix B because only white candidates competed. However, my analysis of the election indicates that white voters again provided overwhelming support to Strickland, while Black voters overwhelmingly supported his opponent, who was defeated.

Previous state senate district 23, with the highest overlap percentage with Illustrative state senate district 23, has had only one recent contested election. The estimates for this election can be found in Appendix B. Over 90% of white voters supported the White candidate, Max Burns, while Black voters overwhelmingly supported his Black opponent, Ceretta Smith, who lost the contest.

Illustrative state senate district 28 overlaps the most with Previous state senate district 16, which had a 22.0% BVAP. The 2020 election contest for this seat was racially polarized, with over 90% of white voters supporting the winning white candidate and well over 90% of the Black voters supporting his Black opponent. (See Appendix B.) Only white candidates competed for the seat in 2018;<sup>10</sup> there was no contested election in this district in 2016.

Although Table 2 indicates that Illustrative state house district 73 overlaps the most with Previous state house district 78, which did provide Black voters with an opportunity to elect their candidates of choice, Illustrative District 73 is an additional majority Black district because Previous state house district 73 was not an effective Black district. Previous state house district 73, with a 35.12% BVAP, had one recent election that included a Black candidate. In this 2016 election, the Black candidate garnered nearly all of the Black vote but none of the white vote and lost to the candidate supported by white voters.<sup>11</sup> (See Appendix B.)

Illustrative house district 110 overlaps the most with Previous district 130, which had a BVAP of 36.30%. The only recent contested election for this seat was in 2020. White voters overwhelmingly supported the winner, while Black voters overwhelmingly supported his Black opponent. (See Appendix B.)

Recent elections in Previous state house district 145, which has the highest overlap with Illustrative state house district 144, also failed to provide Black voters with an opportunity to elect their candidates of choice. The district elections in 2016 and 2020 (there was no contested

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<sup>10</sup> Because the 2018 election for this district included only white candidates, it is not included in Appendix B. However, my analysis of this election contest indicates that it was also starkly polarized and the candidate supported by Black voters lost to the candidate supported by white voters.

<sup>11</sup> The 2020 election included only white candidates and therefore is not in Appendix B. However, my analysis of the election contest indicates that it was racially polarized and the candidate overwhelmingly preferred by Black voters was defeated by the candidate of choice of white voters. There was no contested election in 2018.

election in 2018) were starkly polarized and the Black candidate, despite overwhelming support from Black voters, lost to the white voters' candidate of choice. (See Appendix B.)

There have been no recent contested elections in Previous state house district 171 – the district that Illustrative state house district 153 overlaps with the most. The district had a BVAP of 36.1% and consistently elected a white Republican to the Georgia state house.

***The Enacted Plans continue to fail to provide Black voters with opportunities to elect their preferred candidates that the Illustrative Plans would provide*** In order to determine if a proposed district is likely to provide minority voters with an opportunity to elect their candidates of choice, a district-specific, functional analysis is necessary. This assessment depends not only upon the demographic composition of the district but the voting patterns in that district and whether the candidates preferred by minority voters can actually win in the district – this is what is meant by “functional.” In the case of the Enacted and Illustrative districts, election results recompiled to conform to the boundaries of the newly enacted and illustrative districts must be used to make this determination.

The best election contests to use for a functional analysis are recent elections that included a viable major party minority candidate supported by minority voters but not by white voters. Five recent statewide general election contests in Georgia satisfy these conditions: the 2021 and 2020 special general and special runoff elections for U.S. Senate, with Raphael Warnock; the 2018 race for Governor, in which Stacey Abrams ran; and the 2018 contests for Commissioner of Insurance and School Superintendent, in which Black candidates Janice Laws and Otha Thornton competed, respectively. After recompiling the election results for these five contests to conform to the boundaries of the districts, an average of the five vote proportions for the Black-preferred candidates was calculated. I refer to this average as the general election effectiveness score (GE score).

To provide an indication of how Black-preferred candidates would fare in Democratic primaries (Black voters are far more likely to choose to vote in Democratic primaries than Republican primaries in Georgia), six recent statewide Democratic primaries were used to construct a Democratic primary “effectiveness” score (DPr score). The primaries chosen, and the name of the Black candidate supported by Black voters in each of these primary contests, are as follows:

- 2018 Governor with Stacey Abrams



- 2018 Lieutenant Governor with Tirana Arnold James
- 2018 Commissioner of Insurance with Janice Laws
- 2018 School Superintendent with Otha Thornton
- 2018 Commissioner of Labor with Fred Quinn
- 2018 Secretary of State with Dee Dawkins-Haigler

If a district is majority BVAP or has a significant BVAP and recompiled election results for that district produced a score of at least 0.5 on both the GE and the DPr indices, I deemed the district likely to provide Black voters with an opportunity to elect their candidates of choice. If not, I deemed the district not likely to provide Black voters with an opportunity to elect their candidates of choice (i.e., the candidates preferred by Black voters would typically lose to candidates preferred by white voters). As the plan comparison tables (Plan Comparison Tables 1-6), below, will show, Black voters would have a greater opportunity to elect their candidates of choice in the Illustrative legislative districts highlighted than in the Enacted districts in the same area.

In all six areas of Georgia that I examined, voting is racially polarized, and the Enacted Plans fail to provide seven majority Black districts that would provide Black voters with the opportunity to elect their candidates of choice that the Illustrative Plans demonstrate can be drawn. The following provides a brief description of the six areas, along with maps and district comparison tables.

*Eastern Atlanta Metro Region* Voting is racially polarized in this area – in all seven of the general elections and in five of the eight Democratic primaries, Black and white voters supported different candidates. The Enacted Senate Plan fails to provide a majority Black opportunity district that the Illustrative Plan offers in this area (labeled District 17), as shown in Map and Comparison Table 1.

*Southern Atlanta Metro Region* Voting in the seven general elections and six of the eight Democratic primaries analyzed was racially polarized. The Enacted Senate Plan fails to provide a majority Black opportunity district that the Illustrative Plan offers in this area (District 28), as shown in Map and Comparison Table 2.

*East Central Georgia* Voting in the seven general elections and six of the eight Democratic primaries was racially polarized in this area of the State. The Enacted Senate Plan fails to provide a

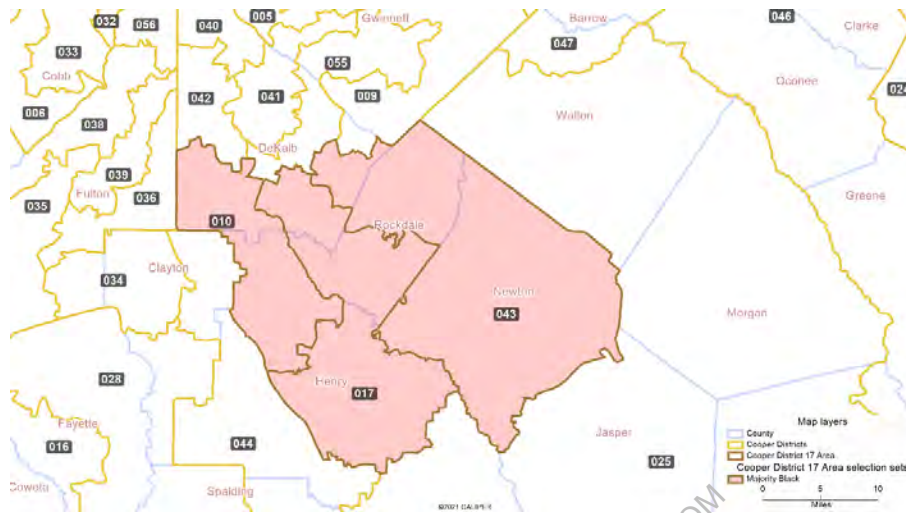
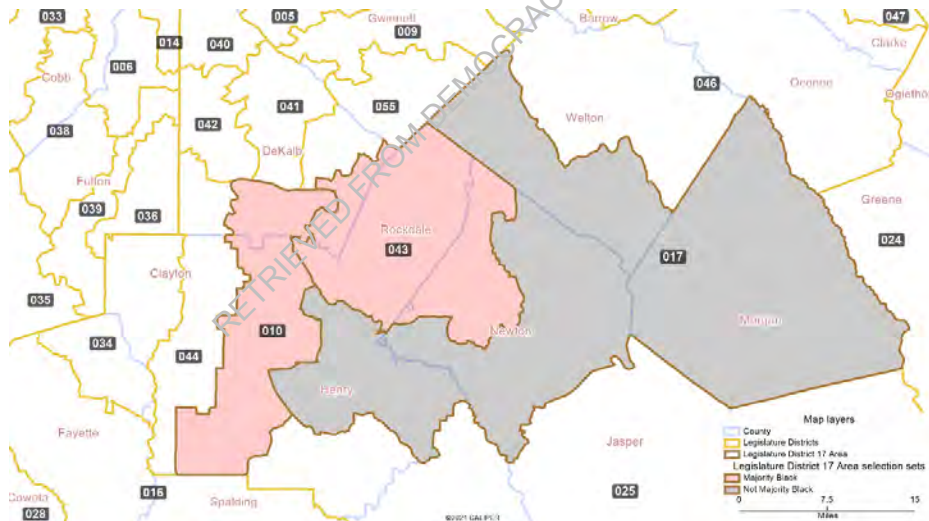
majority Black opportunity district that the Illustrative Plan offers in this area (District 23), as shown in Map and Comparison Table 3.

*Southeastern Atlanta Metro Region* Voting is racially polarized in this area – in all seven of the general elections and six of the eight Democratic primaries, Black and white voters supported different candidates. The Enacted House Plan fails to draw two Black majority opportunity districts that the Illustrative Plan offers in this area (Districts 73 and 110), as shown in Map and Comparison Table 4.

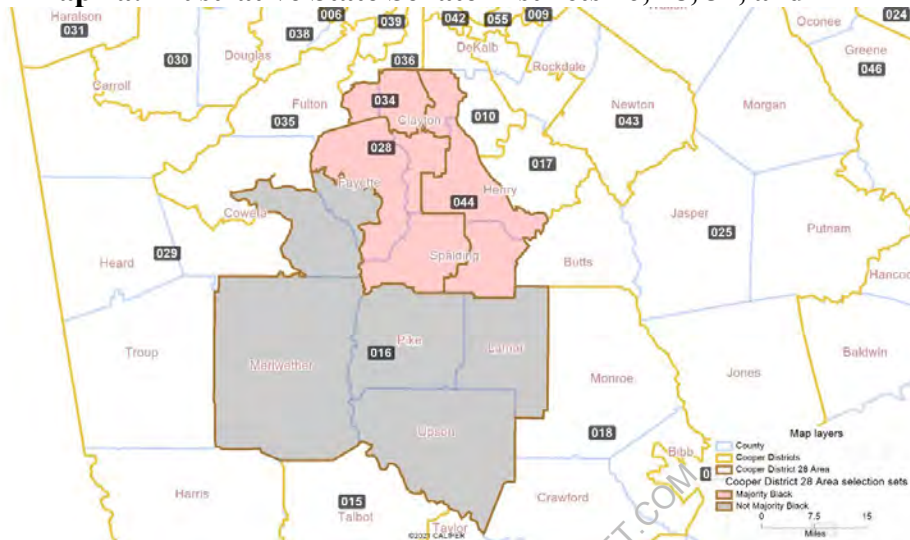
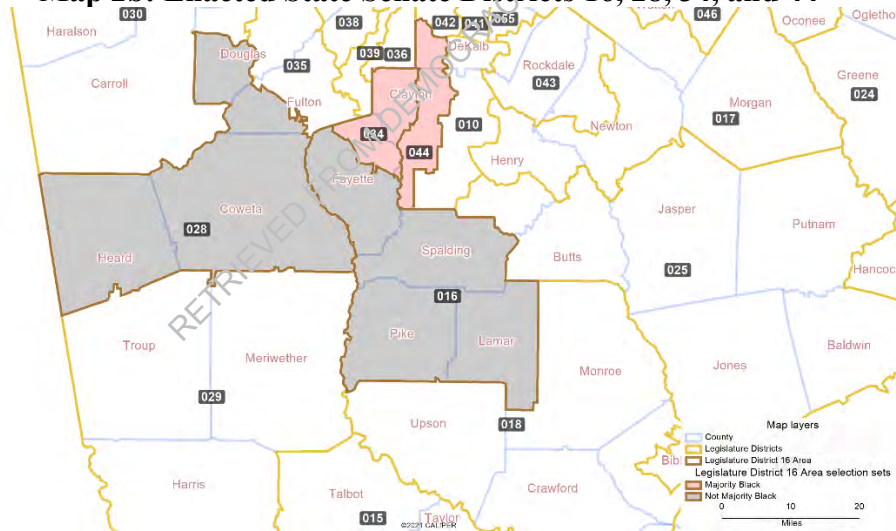
*Central Georgia* Voting in the seven of the general elections analyzed and in at least four of the eight Democratic primaries was racially polarized in this area of the State. The Enacted House Plan fails to provide a majority Black opportunity district that the Illustrative Plan offers in this area (District 144), as shown in Map and Comparison Table 5.

*Southwest Georgia* Voting is racially polarized in this area of the State. In all seven of the general elections and at least four of the eight Democratic primaries, Black and white voters supported different candidates. The Enacted State House Plan fails to provide a majority Black opportunity district that the Illustrative plan offers in this area (District 153), as shown in Map and Comparison Table 6.

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**Map 1: Eastern Atlanta Metro Region****Map 1a: Illustrative State Senate Districts 10, 17 and 43****Map 1b: Enacted State Senate Districts 10, 17, and 43****Comparison Table 1**

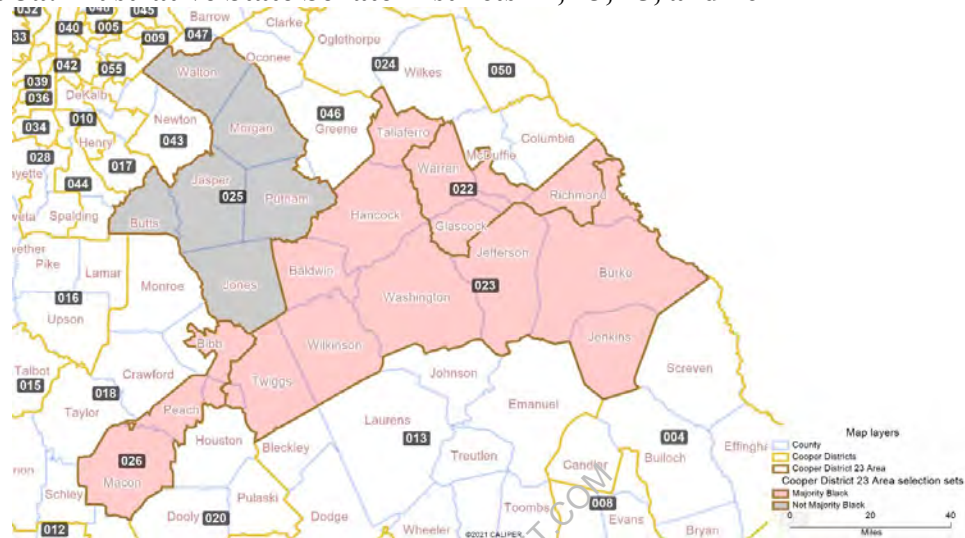
<b>Illustrative District</b>	<b>BVAP %</b>	<b>GE score</b>	<b>DPr score</b>		<b>Enacted District</b>	<b>BVAP %</b>	<b>GE score</b>	<b>DPr score</b>
10	69.8%	0.809	0.599		10	71.5%	0.758	0.638
17	62.5%	0.635	0.631		17	32.0%	0.352	0.575
43	58.1%	0.614	0.613		43	64.3%	0.686	0.623

**Map 2: Southern Atlanta Metro Region****Map 2a: Illustrative State Senate Districts 16, 28, 34, and 44****Map 2b: Enacted State Senate Districts 16, 28, 34, and 44****Comparison Table 2**

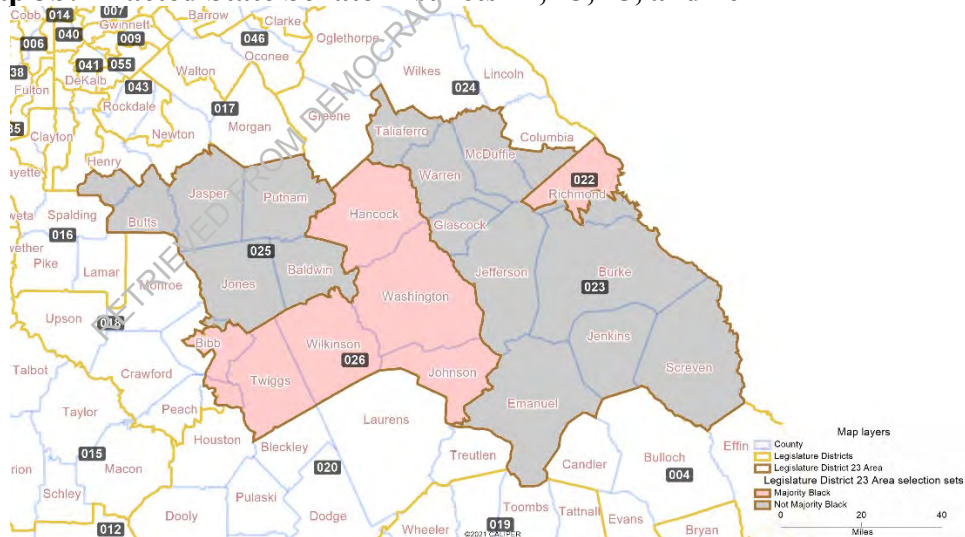
<b>Illustrative District</b>	<b>BVAP %</b>	<b>GE score</b>	<b>DPr score</b>		<b>Enacted District</b>	<b>BVAP %</b>	<b>GE score</b>	<b>DPr score</b>
16	19.0%	0.283	0.517		16	22.7%	0.317	0.528
28	52.7%	0.592	0.606		28	19.5%	0.287	0.527
34	77.8%	0.863	0.623		34	69.5%	0.791	0.618
44	55.1%	0.623	0.612		44	71.3%	0.834	0.600

### Map 3: East Central Georgia

**Map 3a: Illustrative State Senate Districts 22, 23, 25, and 26**



**Map 3b: Enacted State Senate Districts 22, 23, 25, and 26**



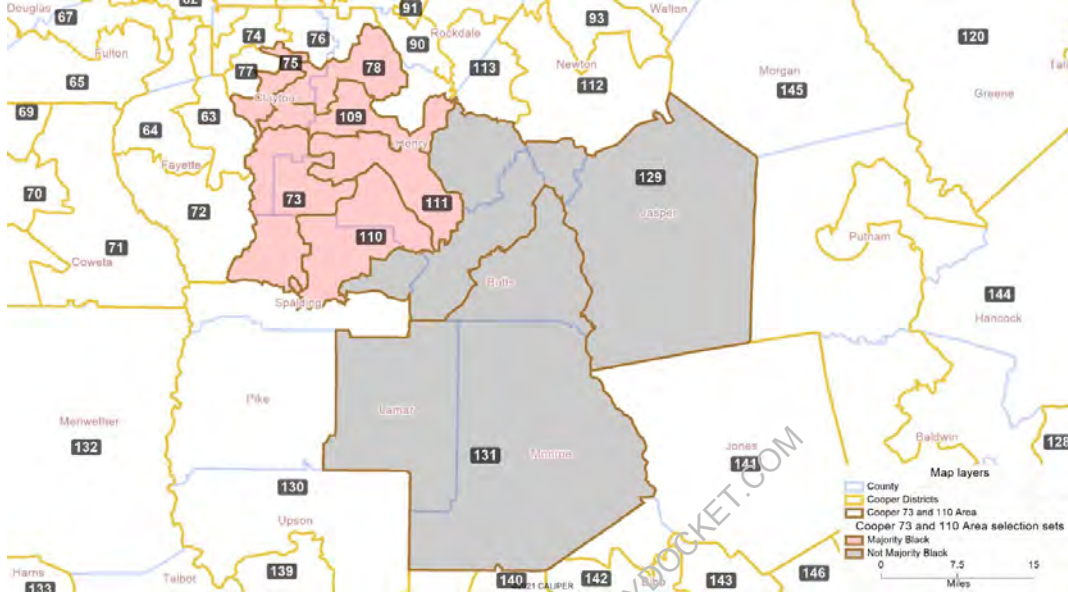
**Comparison Table 3**

Illustrative District	BVAP %	GE score	DPr score	Enacted District	BVAP %	GE score	DPr score
22	52.2%	0.593	0.599	22	56.5%	0.647	0.603
23	50.5%	0.519	0.588	23	35.5%	0.378	0.585
25	22.0%	0.254	0.539	25	33.5%	0.374	0.572
26	54.0%	0.600	0.611	26	57.0%	0.608	0.585

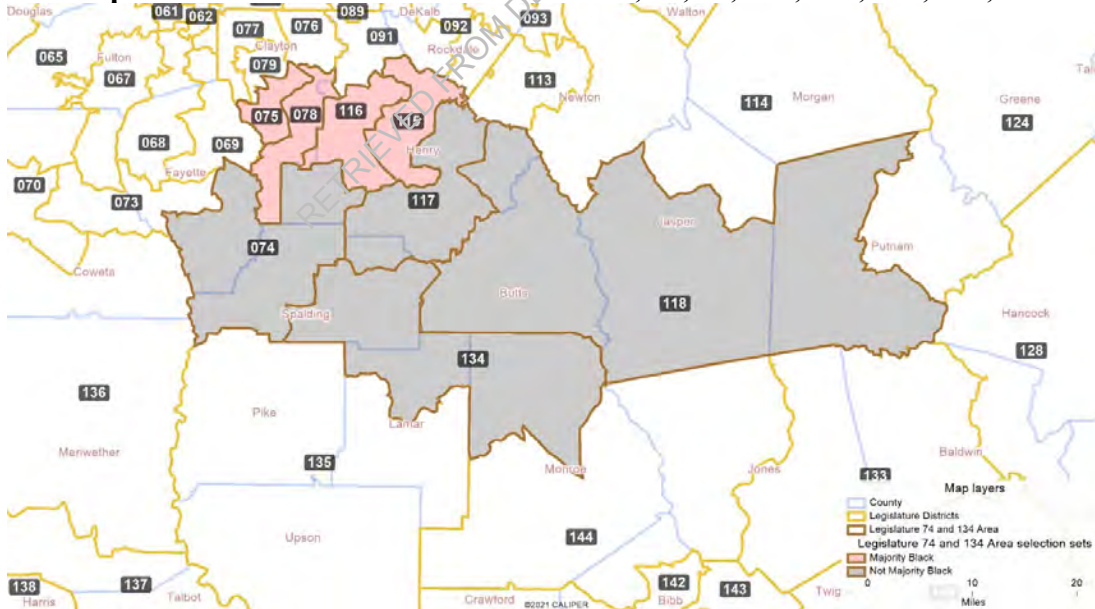


### Map 4: Southeastern Atlanta Metro Area

**Map 4a: Illustrative State House Districts 73, 75, 78, 109, 110, 111, 129, 131**



**Map 4b: Enacted State House Districts 74, 75, 78, 115, 116, 117, 118, 134**



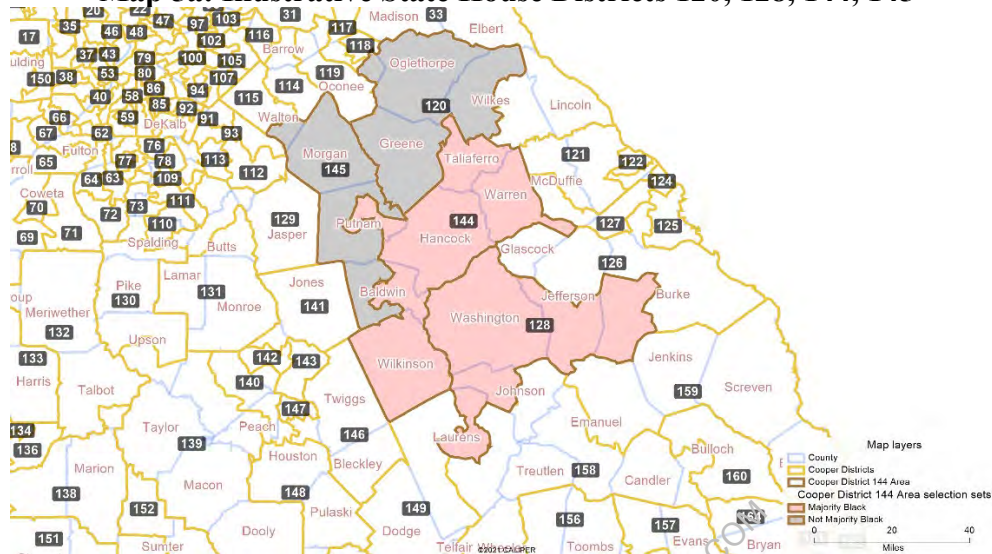
**Comparison Table 4**

<b>Illustrative District</b>	<b>BVAP %</b>	<b>GE score</b>	<b>DPr Score</b>		<b>Enacted District</b>	<b>BVAP %</b>	<b>GE score</b>	<b>DPr Score</b>
<b>73</b>	60.6%	0.661	0.630		74	25.5%	0.341	0.577
75	68.0%	0.805	0.616		75	74.4%	0.831	0.621
78	55.1%	0.648	0.611		78	71.6%	0.773	0.613
109	55.9%	0.610	0.617		115	52.3%	0.546	0.623
<b>110</b>	52.4%	0.561	0.588		116	58.1%	0.651	0.630
111	55.8%	0.582	0.622		117	36.6%	0.414	0.591
129	21.1%	0.246	0.540		118	23.6%	0.253	0.551
131	25.1%	0.268	0.531		134	33.6%	0.342	0.540

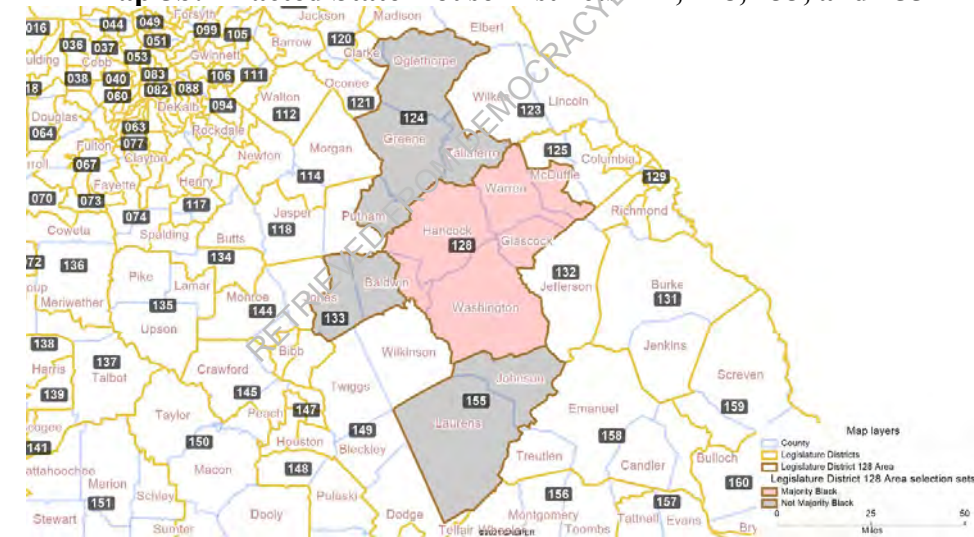
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## Map 5: Central Georgia

**Map 5a: Illustrative State House Districts 120, 128, 144, 145**



**Map 5b: Enacted State House Districts 124, 128, 133, and 155**

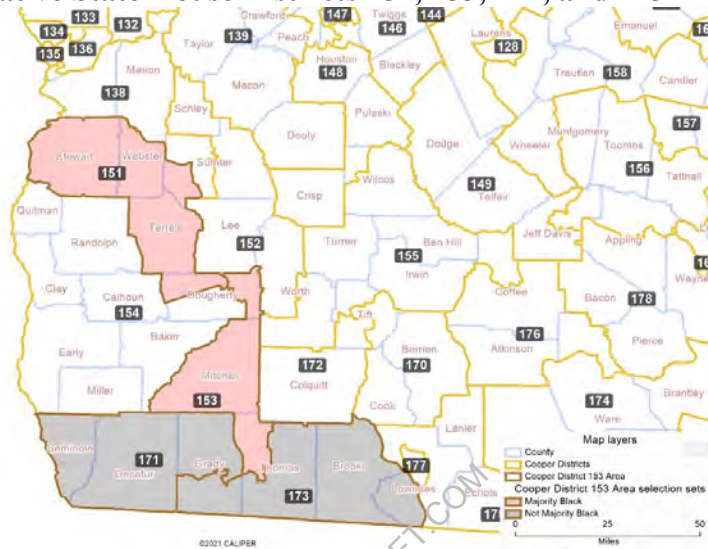


**Comparison Table 5**

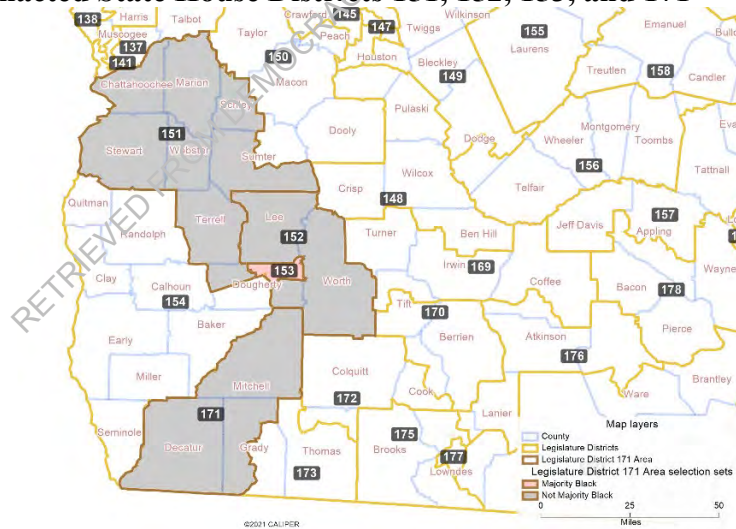
Illustrative District	BVAP %	GE Score	DPr Score	Enacted District	BVAP %	GE Score	DPr Score
120	26.2%	0.437	0.519	124	25.6%	0.366	0.534
128	56.1%	0.486	0.566	128	50.4%	0.463	0.566
144	50.5%	0.535	0.585	133	36.5%	0.422	0.582
145	21.1%	0.273	0.529	155	35.9%	0.313	0.569

### Map 6: Southwest Georgia

**Map 6a: Illustrative State House Districts 151, 153, 171, and 173**



**Map 6b: Enacted State House Districts 151, 152, 153, and 171**



**Comparison Table 6**

Illustrative District	BVAP %	GE Score	DPr Score		Proposed District	BVAP %	GE Score	DPr Score
151	56.6%	0.528	0.633		151	42.4%	0.443	0.603
153	58.0%	0.538	0.638		152	26.1%	0.273	0.615
171	35.6%	0.322	0.590		153	67.9%	0.636	0.651
173	27.6%	0.288	0.582		171	39.6%	0.352	0.588



***Additional majority BVAP districts in the Illustrative Plans draw population from Enacted districts that would fail to provide an opportunity to elect*** As the previous discussion demonstrates, the Enacted State Senate and House Plans fail to provide Black voters with an opportunity to elect their candidates of choice in areas of the State where voting is racially polarized and where the Illustrative Plans show majority BVAP districts can be drawn. The seven additional majority Black Illustrative districts I focus on in this report were all drawn by pulling in population from at least one district in an Enacted Plan that fails to provide Black voters with an opportunity to elect their preferred candidates. The two tables below, Table 3 and Table 4, identify the Enacted districts that overlap with each Illustrative district analyzed by at least 5%, the percent of the Enacted district that overlaps with the Illustrative district, and indicate which of the Enacted districts are Black opportunity districts and which are not by reporting the percentage BVAP, and the GE and DPr scores. (*Appendix C* contains the same comparative information for the Illustrative and Previous State House and State Senate Plans.)

**Table 3: Illustrative and Enacted State Senate District Overlaps**

New Illustrative State Senate District	Overlaps with Enacted State Senate Districts	% Illustrative District in Enacted District	Effectiveness of Enacted Districts		
			BVAP %	GE score	DPr score
17	10	20.2%	71.5	0.758	0.638
	17	37.9%	32.0	0.352	0.575
	43	30.4%	64.3	0.686	0.623
	25	6.1%	33.5	0.374	0.572
23	22	13.4%	56.5	0.647	0.603
	23	31.1%	35.5	0.378	0.585
	25	22.7%	33.5	0.374	0.572
	26	32.9%	57.0	0.608	0.585
28	16	44.3%	22.7	0.317	0.528
	34	26.1%	69.5	0.791	0.618
	44	29.7%	71.3	0.834	0.600



**Table 4: Illustrative and Enacted State House District Overlaps**

<b>New Illustrative State House District</b>	<b>Overlaps with Enacted State House Districts</b>	<b>% Illustrative District in Enacted District</b>	<b>Effectiveness of Enacted Districts</b>		
			<b>BVAP %</b>	<b>GE score</b>	<b>DPr score</b>
<b>73</b>	74	38.2%	25.5	0.341	0.577
	75	8.8%	74.4	0.831	0.621
	78	46.2%	71.6	0.773	0.613
	116	6.9%	58.1	0.651	0.630
<b>110</b>	74	9.9%	25.5	0.341	0.577
	116	8.7%	58.1	0.651	0.630
	117	39.6%	36.6	0.414	0.591
	134	41.8%	33.6	0.342	0.540
<b>144</b>	124	12.5%	25.6	0.366	0.534
	128	32.4%	50.4	0.463	0.566
	133	36.7%	36.5	0.422	0.582
	149	15.0%	29.4	0.312	0.556
<b>153</b>	153	31.0%	68.0	0.636	0.651
	171	36.1%	39.6	0.352	0.588
	173	27.1%	36.3	0.357	0.618

**VII. Conclusion**

My analysis of voting patterns by race found that the Black community in the six areas of Georgia that I examined is cohesive in supporting their preferred candidates and that white voters consistently bloc vote to defeat these candidates in areas where Black majority opportunity districts could have been created but were not. Racially polarized voting substantially impedes the ability of Black voters to elect candidates of their choice to the Georgia state legislature in these areas unless districts are drawn to provide Black voters with this opportunity. The Enacted State Senate and House Plans dilute the voting strength of Black voters in Georgia by failing to create additional districts in these areas that offer Black voters an opportunity to elect their candidates of choice to the state legislature.

\*\*\*

I reserve the right to modify and/or supplement my opinions, as well as to offer new opinions.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Respectfully submitted and executed on January 7, 2022.

A handwritten signature in blue ink that reads "Lisa Handley". The signature is written in a cursive, flowing style. Below the signature is a solid horizontal line.

Dr. Lisa Handley

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# Appendix A

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Eastern Atlanta Metro Region (Area 1)	Race	Party	Estimates of Voting Patterns by Race in Recent Statewide Elections					
			Black Voters			White Voters		
			HP	ER	EI	HP	ER	EI
<b>2021 Runoffs</b>								
<b>US Special Senate Runoff</b>								
Raphael Warnock	B	D		103.6	99.6		37.5	33.8
Kelly Loeffler	W	R		-3.8	0.4		62.4	66.3
<b>US Senate Runoff</b>								
Jon Ossoff	W	D		103.6	99.4		36.6	32.7
David Perdue	W	R		-3.6	0.5		63.4	67.0
<b>2020 General</b>								
<b>US Senate</b>								
Jon Ossoff	W	D		100.6	99.4		35.0	31.7
Shane Hazel	W	L		2.0	2.0		2.1	2.1
David Perdue	W	R		-2.6	0.5		62.9	68.0
<b>US Special Senate</b>								
Raphael Warnock	B	D		71.3	75.2		30.3	27.2
Doug Collins	W	R		-1.1	0.6		22.1	23.8
Kelly Loeffler	W	R		-2.5	0.7		37.3	40.0
Others				32.3	31.7		10.3	8.7
<b>2018 General</b>								
<b>Governor</b>								
Stacey Abrams	B	D		98.0	103.2		33.6	34.4
Ted Metz	W	L		0.2	0.1		1.5	1.3
Brian Kemp	W	R		1.8	-3.3		64.9	64.7
<b>Commissioner of Insurance</b>								
Janice Laws	B	D		96.2	101.5		30.6	31.2
Donnie Foster	W	L		1.5	1.6		3.8	3.9
Jim Beck	W	R		2.3	-3.0		65.6	66.7
<b>School Superintendent</b>								
Otha Thornton	B	D		96.9	102.8		29.1	30.4
Richard Woods	W	R		3.1	-2.8		70.8	69.6
<b>2020 Democratic Primary</b>								
<b>US Senate</b>								
James Knox	B	D		3.3	4.3		0.0	0.8
Jon Ossoff	W	D		62.5	60.6		53.9	53.4
Marck Keith DeJesus	B	D		3.3	4.5		0.6	0.0
Maya Dillard Smith	B	D		8.5	10.8		1.3	1.3
Sarah Riggs Amico	W	D		11.4	13.0		5.8	6.1
Teresa Pike Tomlinson	W	D		8.4	3.5		38.1	37.0
Tricia Carpenter McCracken	W	D		2.6	3.2		0.2	0.5

Eastern Atlanta Metro Region (Area 1)	Race	Party	Estimates of Voting Patterns by Race in Recent Statewide Elections					
			Black Voters			White Voters		
			HP	ER	EI	HP	ER	EI
<b>2018 Democratic Primary</b>								
<b>Governor</b>								
Stacey Abrams	B	D	87.5	87.4	88.7		62.4	64.0
Stacey Evans	W	D	12.5	12.6	11.3		37.6	36.1
<b>Lieutenant Governor</b>								
Sarah Riggs Amico	W	D	43.0	38.8	38.8		93.9	94.0
Triana Arnold James	B	D	57.0	61.2	61.2		6.1	6.0
<b>Commissioner of Insurance</b>								
Cindy Zeldin	W	D	28.2	20.8	23.4		82.5	83.7
Janice Laws	B	D	71.8	79.2	76.6		17.6	16.2
<b>Commissioner of Labor</b>								
Fred Quinn	B	D	53.5	54.8	54.7		32.3	31.7
Richard Keatley	W	D	46.5	45.3	45.3		67.7	68.3
<b>Secretary of State</b>								
Dee Dawkins-Haigler	B	D	41.0	40.8	41.5		21.4	22.4
John Barrow	W	D	39.2	35.8	35.4		68.0	67.3
Rakeim Hadley	B	D	19.8	23.3	23.2		10.6	10.3
<b>School Superintendent</b>								
Otha Thornton	B	D	49.7	52.4	52.6		22.6	22.9
Sam Mosteller	B	D	17.7	17.9	17.3		23.0	22.3
Sid Chapman	W	D	32.6	29.6	30.2		54.4	54.8
<b>2016 Democratic Primary</b>								
<b>US Senate</b>								
Cheryl Copeland	B	D	45.1	47.7	47.0	22.9	24.9	24.7
Jim Barksdale	W	D	52.5	50.5	51.1	69.8	67.7	67.6
John Coyne	W	D	2.4	1.8	2.5	7.3	7.5	7.6



Southern Atlants Metro Region (Area 2)	Race	Party	Estimates of Voting Patterns by Race in Recent Statewide Elections					
			Black Voters			White Voters		
			HP	ER	EI	HP	ER	EI
<b>2021 Runoffs</b>								
<b>US Special Senate Runoff</b>								
Raphael Warnock	B	D		114.3	99.2		6.8	8.1
Kelly Loeffler	W	R		-14.2	0.8		93.2	82.0
<b>US Senate Runoff</b>								
Jon Ossoff	W	D		114.1	98.1		6.3	7.5
David Perdue	W	R		-14.1	0.7		93.7	92.7
<b>2020 General</b>								
<b>US Senate</b>								
Jon Ossoff	W	D		110.7	99.3	9.0	5.5	5.7
Shane Hazel	W	L		2.3	2.2	1.3	2.2	2.5
David Perdue	W	R		-12.9	0.7	89.7	92.4	91.9
<b>US Special Senate</b>								
Raphael Warnock	B	D		77.4	77.3	6.8	5.2	5.1
Doug Collins	W	R		-5.6	0.7	34.1	35.4	34.5
Kelly Loeffler	W	R		-8.5	0.7	50.8	51.9	51.7
Others				36.6	37.2	8.3	7.5	7.4
<b>2018 General</b>								
<b>Governor</b>								
Stacey Abrams	B	D		112.3	99.2	10.2	4.0	5.3
Ted Metz	W	L		0.2	0.5	0.7	1.3	1.4
Brian Kemp	W	R		-12.5	0.7	89.1	94.7	93.4
<b>Commissioner of Insurance</b>								
Janice Laws	B	D		109.9	99.3	10.3	3.4	3.9
Donnie Foster	W	L		1.9	1.9	1.8	2.7	3.1
Jim Beck	W	R		-11.9	0.7	87.9	93.9	93.3
<b>School Superintendent</b>								
Otha Thornton	B	D		110.8	99.4	10.0	2.8	3.7
Richard Woods	W	R		-10.8	0.6	90.0	97.2	96.3
<b>2020 Democratic Primary</b>								
<b>US Senate</b>								
James Knox	B	D		4.4	4.0		2.9	3.9
Jon Ossoff	W	D		58.0	58.1		54.1	53.6
Marck Keith DeJesus	B	D		4.5	4.8		1.3	1.6
Maya Dillard Smith	B	D		11.0	11.6		0.9	1.3
Sarah Riggs Amico	W	D		12.7	12.2		12.9	13.1
Teresa Pike Tomlinson	W	D		6.4	6.6		26.2	24.7
Tricia Carpenter McCracken	W	D		3.0	3.0		1.6	2.2

Southern Atlants Metro Region (Area 2)	Race	Party	Estimates of Voting Patterns by Race in Recent Statewide Elections					
			Black Voters			White Voters		
			HP	ER	EI	HP	ER	EI
<b>2018 Democratic Primary</b>								
<b>Governor</b>								
Stacey Abrams	B	D	84.7	89.3	88.7		46.0	47.6
Stacey Evans	W	D	15.3	10.7	11.2		54.0	52.4
<b>Lieutenant Governor</b>								
Sarah Riggs Amico	W	D	44.5	39.1	37.8		89.1	88.4
Triana Arnold James	B	D	55.5	60.9	62.2		10.8	11.8
<b>Commissioner of Insurance</b>								
Cindy Zeldin	W	D	27.0	23.8	23.4		57.1	58.6
Janice Laws	B	D	73.0	76.3	76.6		42.7	41.5
<b>Commissioner of Labor</b>								
Fred Quinn	B	D	49.9	50.3	51.1		46.3	44.0
Richard Keatley	W	D	50.1	49.8	48.8		53.8	55.7
<b>Secretary of State</b>								
Dee Dawkins-Haigler	B	D	30.9	33.2	24.3		24.6	25.7
John Barrow	W	D	44.5	40.7	39.0		65.9	65.1
Rakeim Hadley	B	D	24.6	26.0	27.2		9.3	8.2
<b>School Superintendent</b>								
Otha Thornton	B	D	47.2	52.0	52.4		20.3	24.5
Sam Mosteller	B	D	18.1	16.1	15.9		30.0	27.8
Sid Chapman	W	D	34.7	32.0	32.4		49.7	46.5
<b>2016 Democratic Primary</b>								
<b>US Senate</b>								
Cheryl Copeland	B	D	48.3	49.1	49.7		31.2	31.9
Jim Barksdale	W	D	49.5	49.5	48.1		62.9	64.6
John Coyne	W	D	2.2	1.4	1.0		5.9	6.7

East Central Georgia (Area 3)	Race	Party	Estimates of Voting Patterns by Race in Recent Statewide Elections					
			Black Voters			White Voters		
			HP	ER	EI	HP	ER	EI
<b>2021 Runoffs</b>								
<b>US Special Senate Runoff</b>								
Raphael Warnock	B	D		109.2	99.3	12.8	6.0	8.7
Kelly Loeffler	W	R		-9.2	0.7	87.2	94.0	91.8
<b>US Senate Runoff</b>								
Jon Ossoff	W	D		108.9	99.3	12.6	5.9	8.5
David Perdue	W	R		-8.9	0.7	87.4	94.1	91.5
<b>2020 General</b>								
<b>US Senate</b>								
Jon Ossoff	W	D		104.7	99.0	11.9	5.3	6.5
Shane Hazel	W	L		2.4	2.4	1.6	1.8	1.6
David Perdue	W	R		-7.1	0.8	86.5	92.9	91.8
<b>US Special Senate</b>								
Raphael Warnock	B	D		70.3	72.1	8.6	4.1	4.0
Doug Collins	W	R		-3.1	0.0	35.4	35.6	32.5
Kelly Loeffler	W	R		-6.0	0.9	46.4	52.8	51.4
Others				39.7	39.7	9.4	7.5	7.1
<b>2018 General</b>								
<b>Governor</b>								
Stacey Abrams	B	D		107.5	99.3	10.6	3.6	7.0
Ted Metz	W	L		0.3	0.6	0.5	0.9	0.3
Brian Kemp	W	R		-8.9	0.6	88.8	95.5	92.2
<b>Comissioner of Insurance</b>								
Janice Laws	B	D		105.0	99.2	10.7	3.1	5.6
Donnie Foster	W	L		1.5	1.5	1.6	2.2	2.2
Jim Beck	W	R		-6.5	0.8	87.6	94.7	92.6
<b>School Superintendent</b>								
Otha Thornton	B	D		109.8	na	10.6	2.9	5.7
Richard Woods	W	R		-5.7	na	89.4	97.1	94.3
<b>2020 Democratic Primary</b>								
<b>US Senate</b>								
James Knox	B	D	7.8	7.1	6.6		12.3	10.6
Jon Ossoff	W	D	40.9	45.8	46.3		43.1	41.3
Marck Keith DeJesus	B	D	5.1	5.4	4.6		3.4	3.0
Maya Dillard Smith	B	D	16.7	14.6	15.1		3.6	4.7
Sarah Riggs Amico	W	D	14.5	14.7	14.1		14.1	15.1
Teresa Pike Tomlinson	W	D	11.1	8.5	8.4		18.6	20.5
Tricia Carpenter McCracken	W	D	4.0	3.9	3.7		4.8	5.1

East Central Georgia (Area 3)	Race	Party	Estimates of Voting Patterns by Race in Recent Statewide Elections					
			Black Voters			White Voters		
			HP	ER	EI	HP	ER	EI
<b>2018 Democratic Primary</b>								
<b>Governor</b>								
Stacey Abrams	B	D	78.0	83.8	82.8	30.9	41.2	47.3
Stacey Evans	W	D	22.0	16.2	17.1	69.1	58.7	52.4
<b>Lieutenant Governor</b>								
Sarah Riggs Amico	W	D	47.4	43.8	52.6	67.7	78.5	82.7
Triana Arnold James	B	D	52.6	56.2	57.4	32.3	21.5	17.0
<b>Commissioner of Insurance</b>								
Cindy Zeldin	W	D	18.9	19.7	19.1	38.9	51.4	54.7
Janice Laws	B	D	81.1	80.3	80.9	61.1	48.6	45.4
<b>Commissioner of Labor</b>								
Fred Quinn	B	D	53.6	55.5	55.1	40.9	40.5	40.6
Richard Keatley	W	D	46.4	44.5	44.9	59.1	59.3	59.5
<b>Secretary of State</b>								
Dee Dawkins-Haigler	B	D	22.3	24.9	27.4	11.3	16.4	14.0
John Barrow	W	D	65.2	59.3	54.9	85.8	77.3	79.5
Rakeim Hadley	B	D	12.5	15.8	18.0	2.8	6.2	4.3
<b>School Superintendant</b>								
Otha Thornton	B	D	46.2	50.2	50.6	17.2	21.1	24.9
Sam Mosteller	B	D	19.2	18.1	17.8	31.2	29.8	29.9
Sid Chapman	W	D	34.5	31.8	31.9	51.6	49.1	45.4
<b>2016 Democratic Primary</b>								
<b>US Senate</b>								
Cheryl Copeland	B	D	48.1	49.7	50.2	22.4	24.3	24.2
Jim Barksdale	W	D	48.5	47.1	46.6	71.7	70.5	69.2
John Coyne	W	D	3.3	3.2	3.5	5.9	5.3	5.7

Southeastern Atlanta Metro Region (Area 4)	Race	Party	Estimates of Voting Patterns by Race in Recent Statewide Elections					
			Black Voters			White Voters		
			HP	ER	EI	HP	ER	EI
<b>2021 Runoffs</b>								
<b>US Special Senate Runoff</b>								
Raphael Warnock	B	D		113.1	99.3	14.6	7.9	7.7
Kelly Loeffler	W	R		-13.1	0.8	85.4	92.1	92.3
<b>US Senate Runoff</b>								
Jon Ossoff	W	D		113.0	99.3	14.2	7.5	7.2
David Perdue	W	R		-13.0	0.7	85.8	92.5	92.8
<b>2020 General</b>								
<b>US Senate</b>								
Jon Ossoff	W	D		109.3	na	13.4	6.8	6.9
Shane Hazel	W	L		2.3	na	1.8	2.1	2.3
David Perdue	W	R		-11.7	na	84.8	91.1	92.7
<b>US Special Senate</b>								
Raphael Warnock	B	D		76.3	76.3	10.2	6.3	6.0
Doug Collins	W	R		-5.1	0.7	34.1	34.5	34.4
Kelly Loeffler	W	R		-8.0	0.6	46.7	51.9	51.9
Others				36.8	36.9	8.9	7.2	7.3
<b>2018 General</b>								
<b>Governor</b>								
Stacey Abrams	B	D		11.5	99.2	12.4	4.9	5.3
Ted Metz	W	L		0.2	0.5	0.7	12.5	1.3
Brian Kemp	W	R		-11.7	0.8	86.9	93.9	93.9
<b>Commissioner of Insurance</b>								
Janice Laws	B	D		109.1	99.3	12.2	4.2	4.1
Donnie Foster	W	L		1.9	1.8	2.0	2.6	2.9
Jim Beck	W	R		-10.9	0.7	85.8	93.1	93.8
<b>School Superintendent</b>								
Otha Thornton	B	D		110.2	99.3	12.0	3.6	4.0
Richard Woods	W	R		-10.2	0.7	88.0	96.4	96.0
<b>2020 Democratic Primary</b>								
<b>US Senate</b>								
James Knox	B	D		4.4	4.1		2.3	2.6
Jon Ossoff	W	D		57.3	57.9		57.3	57.9
Marck Keith DeJesus	B	D		4.5	4.4		1.2	1.5
Maya Dillard Smith	B	D		11.3	11.5		2.2	2.3
Sarah Riggs Amico	W	D		12.8	12.4		13.1	13.0
Teresa Pike Tomlinson	W	D		6.6	6.7		22.9	23.0
Tricia Carpenter McCracken	W	D		3.2	3.2		1.1	1.7



Southeastern Atlanta Metro Region (Area 4)	Race	Party	Estimates of Voting Patterns by Race in Recent Statewide Elections					
			Black Voters			White Voters		
			HP	ER	EI	HP	ER	EI
<b>2018 Democratic Primary</b>								
<b>Governor</b>								
Stacey Abrams	B	D	84.5	88.4	88.6		45.2	44.9
Stacey Evans	W	D	15.5	11.6	11.4		54.7	54.7
<b>Lieutenant Governor</b>								
Sarah Riggs Amico	W	D	43.9	39.4	38.6		90.6	88.0
Triana Arnold James	B	D	56.1	60.6	61.3		9.7	12.1
<b>Commissioner of Insurance</b>								
Cindy Zeldin	W	D	26.7	23.7	23.7		55.0	56.2
Janice Laws	B	D	73.3	76.3	76.4		45.1	44.1
<b>Commissioner of Labor</b>								
Fred Quinn	B	D	50.3	51.4	51.6		44.7	44.9
Richard Keatley	W	D	49.7	48.6	48.4		55.4	55.5
<b>Secretary of State</b>								
Dee Dawkins-Haigler	B	D	31.7	33.7	35.0		24.6	25.7
John Barrow	W	D	43.8	40.2	38.7		70.2	68.3
Rakeim Hadley	B	D	34.4	26.0	26.0		5.3	6.2
<b>School Superintendent</b>								
Otha Thornton	B	D	47.3	50.8	51.4		21.5	24.8
Sam Mosteller	B	D	18.3	16.7	16.8		30.4	29.4
Sid Chapman	W	D	34.4	32.5	32.8		48.1	46.3
<b>2016 Democratic Primary</b>								
<b>US Senate</b>								
Cheryl Copeland	B	D	47.9	48.0	49.2		33.6	30.6
Jim Barksdale	W	D	49.5	50.0	48.7		61.8	65.6
John Coyne	W	D	2.6	2.0	1.3		4.6	5.9

Central Georgia (Area 5)	Race	Party	Estimates of Voting Patterns by Race in Recent Statewide Elections					
			Black Voters			White Voters		
			HP	ER	EI	HP	ER	EI
<b>2021 Runoffs</b>								
<b>US Special Senate Runoff</b>								
Raphael Warnock	B	D		100.1	99.0	13.5	10.9	17.0
Kelly Loeffler	W	R		-0.1	1.2	86.5	89.1	83.0
<b>US Senate Runoff</b>								
Jon Ossoff	W	D		99.9	98.9	13.3	10.6	16.7
David Perdue	W	R		0.0	1.1	86.7	89.2	83.3
<b>2020 General</b>								
<b>US Senate</b>								
Jon Ossoff	W	D		95.6	98.9	12.6	9.6	15.1
Shane Hazel	W	L		1.8	1.8	1.4	1.9	0.8
David Perdue	W	R		2.6	1.0	85.9	88.4	84.4
<b>US Special Senate</b>								
Raphael Warnock	B	D		64.8	65.4	9.1	7.8	10.2
Doug Collins	W	R		2.2	1.2	36.1	34.7	33.3
Kelly Loeffler	W	R		-2.4	0.6	46.0	49.9	46.4
Others				35.2	36.5	8.7	7.7	8.1
<b>2018 General</b>								
<b>Governor</b>								
Stacey Abrams	B	D		99.1	na	10.7	7.4	16.3
Ted Metz	W	L		0.1	na	0.6	0.8	0.7
Brian Kemp	W	R		0.6	na	88.7	91.8	83.2
<b>Commissioner of Insurance</b>								
Janice Laws	B	D		96.4	98.6	10.9	7.4	15.1
Donnie Foster	W	L		1.3	1.2	1.5	2.0	2.3
Jim Beck	W	R		2.6	1.3	87.5	90.6	83.7
<b>School Superintendent</b>								
Otha Thornton	B	D		97.0	na	10.7	7.3	15.2
Richard Woods	W	R		2.7	na	89.3	92.7	84.8
<b>2020 Democratic Primary</b>								
<b>US Senate</b>								
James Knox	B	D	8.7	9.9	9.1		7.5	5.8
Jon Ossoff	W	D	40.3	45.4	44.8		44.7	45.2
Marck Keith DeJesus	B	D	4.2	4.4	4.4		2.9	2.2
Maya Dillard Smith	B	D	12.9	12.4	12.5		4.5	3.9
Sarah Riggs Amico	W	D	16.4	16.0	16.7		15.3	14.9
Teresa Pike Tomlinson	W	D	14.0	7.9	9.0		21.7	26.4
Tricia Carpenter McCracken	W	D	3.5	4.0	3.6		3.3	2.4

Central Georgia (Area 5)	Race	Party	Estimates of Voting Patterns by Race in Recent Statewide Elections					
			Black Voters			White Voters		
			HP	ER	EI	HP	ER	EI
<b>2018 Democratic Primary</b>								
<b>Governor</b>								
Stacey Abrams	B	D	79.2	79.5	80.7		54.1	64.0
Stacey Evans	W	D	20.8	20.5	19.3		45.9	36.0
<b>Lieutenant Governor</b>								
Sarah Riggs Amico	W	D	45.7	46.0	45.2		77.4	75.9
Triana Arnold James	B	D	54.3	54.0	54.9		22.5	23.9
<b>Commissioner of Insurance</b>								
Cindy Zeldin	W	D	23.9	20.8	21.1		56.7	63.9
Janice Laws	B	D	76.1	79.3	78.8		43.3	35.9
<b>Commissioner of Labor</b>								
Fred Quinn	B	D	59.9	60.7	61.1		37.2	38.5
Richard Keatley	W	D	40.1	39.3	38.9		62.8	61.5
<b>Secretary of State</b>								
Dee Dawkins-Haigler	B	D	26.8	25.1	24.6		15.5	15.1
John Barrow	W	D	61.2	64.2	64.2		72.7	71.2
Rakeim Hadley	B	D	12.0	10.7	12.6		11.8	12.9
<b>School Superintendent</b>								
Otha Thornton	B	D	45.0	45.5	46.9		23.6	29.4
Sam Mosteller	B	D	19.7	20.3	19.1		23.3	18.0
Sid Chapman	W	D	35.3	34.2	33.5		53.2	50.3
<b>2016 Democratic Primary</b>								
<b>US Senate</b>								
Cheryl Copeland	B	D	48.1	48.6	49.4		23.1	18.6
Jim Barksdale	W	D	48.0	46.9	47.2		72.1	73.3
John Coyne	W	D	3.9	4.6	5.5		4.9	4.6

Southwest Georgia (Area 6)	Race	Party	Estimates of Voting Patterns by Race in Recent Statewide Elections					
			Black Voters			White Voters		
			HP	ER	EI	HP	ER	EI
<b>2021 Runoffs</b>								
<b>US Special Senate Runoff</b>								
Raphael Warnock	B	D	97.4	106.0	99.0	9.6	3.6	7.7
Kelly Loeffler	W	R	2.6	-6.0	1.0	90.4	96.4	92.4
<b>US Senate Runoff</b>								
Jon Ossoff	W	D	97.2	105.9	na	9.7	3.6	7.8
David Perdue	W	R	2.8	-5.9	na	90.3	96.4	92.2
<b>2020 General</b>								
<b>US Senate</b>								
Jon Ossoff	W	D	93.5	101.8	98.9	10.1	3.5	5.2
Shane Hazel	W	L	1.3	1.6	2.0	1.2	1.6	1.8
David Perdue	W	R	5.2	-3.4	0.7	88.7	94.9	92.6
<b>US Special Senate</b>								
Raphael Warnock	B	D	67.6	66.1	65.3	4.4	-0.8	0.2
Doug Collins	W	R	1.3	-3.4	0.9	45.5	43.9	40.2
Kelly Loeffler	W	R	1.8	-1.7	1.0	37.3	44.5	44.8
Others			29.3	38.7	43.0	12.7	12.4	11.2
<b>2018 General</b>								
<b>Governor</b>								
Stacey Abrams	B	D	97.3	104.9	99.0	8.6	2.1	6.1
Ted Metz	W	L	0.2	0.3	0.5	0.6	0.5	0.5
Brian Kemp	W	R	2.5	-5.2	0.6	90.8	97.4	93.3
<b>Commissioner of Insurance</b>								
Janice Laws	B	D	95.5	102.5	99.0	9.3	2.3	5.1
Donnie Foster	W	L	1.4	1.6	2.0	1.4	1.3	1.4
Jim Beck	W	R	3.1	-4.1	0.8	89.4	96.4	93.1
<b>School Superintendent</b>								
Otha Thornton	B	D	95.8	102.7	99.1	8.9	1.8	4.5
Richard Woods	W	R	4.2	-2.7	0.8	91.1	98.2	95.6
<b>2020 Democratic Primary</b>								
<b>US Senate</b>								
James Knox	B	D	8.6	8.2	9.0		15.7	12.7
Jon Ossoff	W	D	50.9	44.9	44.5		10.7	12.5
Marck Keith DeJesus	B	D	5.0	6.0	5.9		4.3	0.0
Maya Dillard Smith	B	D	11.8	13.5	14.5		6.6	5.7
Sarah Riggs Amico	W	D	11.3	12.9	12.1		18.4	19.8
Teresa Pike Tomlinson	W	D	8.7	11.0	10.8		36.6	40.0
Tricia Carpenter McCracken	W	D	3.8	3.3	3.4		7.5	6.6

Southwest Georgia (Area 6)	Race	Party	Estimates of Voting Patterns by Race in Recent Statewide Elections					
			Black Voters			White Voters		
			HP	ER	EI	HP	ER	EI
<b>2018 Democratic Primary</b>								
<b>Governor</b>								
Stacey Abrams	B	D	81.8	86.5	84.0		44.3	48.8
Stacey Evans	W	D	18.2	13.5	15.9		55.9	52.7
<b>Lieutenant Governor</b>								
Sarah Riggs Amico	W	D	39.2	39.2	38.9		74.6	70.1
Triana Arnold James	B	D	60.8	60.8	61.1		25.3	29.4
<b>Commissioner of Insurance</b>								
Cindy Zeldin	W	D	20.0	20.5	20.4		48.9	44.7
Janice Laws	B	D	80.0	79.6	79.6		51.2	54.3
<b>Commissioner of Labor</b>								
Fred Quinn	B	D	56.9	54.6	55.5		50.5	50.2
Richard Keatley	W	D	43.1	45.5	44.3		49.7	48.5
<b>Secretary of State</b>								
Dee Dawkins-Haigler	B	D	29.2	28.8	27.9		27.5	35.2
John Barrow	W	D	48.2	46.0	46.9		62.6	50.2
Rakeim Hadley	B	D	22.6	25.2	24.3		9.7	4.7
<b>School Superintendent</b>								
Otha Thornton	B	D	49.7	48.1	49.0		23.5	30.2
Sam Mosteller	B	D	17.8	19.8	16.2		24.3	33.2
Sid Chapman	W	D	32.5	32.0	31.7		52.1	45.2
<b>2016 Democratic Primary</b>								
<b>US Senate</b>								
Cheryl Copeland	B	D	48.3	52.0	49.3	42.7	45.9	46.9
Jim Barksdale	W	D	48.2	44.5	46.3	48.7	46.4	47.1
John Coyne	W	D	3.5	3.3	1.3	8.5	7.7	9.6



# Appendix B

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Recent State Senate Contests	Race	Party	Vote	Estimates of Voting Patterns by Race in Recent State Legislative Elections					
				Black Voters			White Voters		
				HP	ER	EI	HP	ER	EI
<b>General Elections 2020</b>									
<b>State Senate 16 2020</b>									
Cinquez Jester	B	D	31.8		102.7	99.0		4.3	6.0
Marty Harbin	W	R	68.2		-3.0	1.1		95.7	94.0
Black turnout/VAP			57.3						
White turnout/VAP			73.4						
<b>State Senate 20 2020</b>									
Julius Johnson	B	D	35.0		107.0	98.7		1.4	2.6
Larry Walker	W	R	65.0		-7.1	1.1		98.6	97.7
Black turnout/VAP			56.2						
White turnout/VAP			67.0						
<b>State Senate 23 2020</b>									
Ceretta Smith	B	D	40.7		101.6	98.7	8.4	2.7	4.8
Max Burns	W	R	59.3		-1.5	1.7	91.6	97.3	95.0
Black turnout/VAP			56.3						
White turnout/VAP			64.3						
<b>State Senate 25 2020</b>									
Veronica Brinson	B	D	32.3		110.9	98.8	13.1	3.5	7.4
Burt Jones	W	R	67.7		-11.0	0.7	86.9	96.5	92.5
Black turnout/VAP			51.7						
White turnout/VAP			69.9						
<b>General Elections 2018</b>									
<b>State Senate 17 2018</b>									
Phyllis Hatcher	B	D	45.5		115.7	99.1		1.1	2.9
Brian Strickland	W	R	54.5		-15.6	1.0		98.9	97.1
Black turnout/VAP			48.0						
White turnout/VAP			60.0						
<b>State Senate 34 2018</b>									
Valencia Seay	B	D	82.9		107.5	99.5		7.2	6.6
Tommy Smith	W	R	17.1		-7.5	0.4		92.8	90.1
Black turnout/VAP			45.5						
White turnout/VAP			51.3						
<b>General Elections 2016</b>									
<b>State Senate 17 2016</b>									
Bill Blackmon	B	D	40.4		116.7	99.4		2.0	3.0
Rick Jeffares	W	R	59.6		-16.6	1.1		98.0	97.0
Black turnout/VAP			42.7						
White turnout/VAP			67.0						
<b>State Senate 43 2016</b>									
Tonya Anderson	B	D	70.4	96.0	104.8	99.3		2.4	3.3
Janice Van Ness	W	R	29.6	4.0	-4.8	0.8		97.6	96.6
Black turnout/VAP			47.5						
White turnout/VAP			60.6						

[illegible]

[illegible]

Recent State House Contests	Race	Party	Vote	Estimates of Voting Patterns by Race in Recent State Legislative Elections					
				Black Voters			White Voters		
				HP	ER	EI	HP	ER	EI
<b>Democratic Primaries 2018</b>									
<b>State House 152 2018</b>									
Marcus Batten	B	D	57.9		60.8	63.3		40.2	37.1
Mary Egler	W	D	42.1		39.3	36.7		59.7	62.9
<i>Black turnout/VAP</i>			14.3						
<i>White turnout/VAP</i>			1.1						
<b>State House 153 2018</b>									
CaMia Whitaker Hopson	B	D	51.3	43.0	42.4	43.7		96.0	92.3
Darrel Ealum	W	D	48.7	57.0	57.5	56.3		4.7	6.6
<i>Black turnout/VAP</i>			13.9						
<i>White turnout/VAP</i>			4.6						
<b>Democratic Primaries 2016</b>									
<b>State House 153 2016</b>									
Darrel Ealum	W	D	56.8	43.2	40.3	40.1		90.9	92.0
Muarlean Edwards	B	D	29.8	42.8	45.3	44.4		-0.1	0.1
Antonio Screen	B	D	13.4	14.0	14.2	17.4		14.2	9.2
<i>Black turnout/VAP</i>			14.9						
<i>White turnout/VAP</i>			14.9						

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# Appendix C

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**Appendix Table C1: Effectiveness of Previous State Senate Districts that  
Overlap Additional Illustrative State Senate Districts**

<b>Illustrative State Senate Plan</b>	<b>Previous State Senate Plan</b>	<b>% of Illustrative District in Previous District</b>	<b>BVAP %</b>	<b>GE Score</b>	<b>Pr Score</b>
017	010	17.6%	74.98%	0.786	0.634
017	017	53.7%	41.72%	0.451	0.604
017	043	28.5%	68.74%	0.726	0.630
023	022	13.4%	58.76%	0.670	0.605
023	023	30.3%	35.62%	0.376	0.580
023	025	22.7%	28.50%	0.315	0.556
023	026	29.5%	60.14%	0.630	0.584
028	016	40.7%	22.00%	0.308	0.521
028	034	27.7%	68.34%	0.779	0.617
028	044	31.6%	72.43%	0.838	0.603

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**Appendix Table C2: Effectiveness of Previous State House Districts that  
Overlap Additional Illustrative State House Districts**

<b>Illustrative State House Plan</b>	<b>Previous State House Plan</b>	<b>% of Illustrative District in Prior District</b>	<b>BVAP %</b>	<b>GE Score</b>	<b>Pr Score</b>
073	063	13.6%	71.31%	0.739	0.625
073	073	38.0%	35.12%	0.413	0.596
073	075	6.4%	74.27%	0.821	0.617
073	078	41.8%	68.59%	0.769	0.616
110	073	19.4%	35.12%	0.413	0.596
110	111	23.1%	51.56%	0.557	0.620
110	130	57.5%	36.30%	0.390	0.553
144	120	12.6%	26.62%	0.323	0.570
144	128	23.6%	54.62%	0.491	0.562
144	144	15.0%	27.24%	0.345	0.559
144	145	48.8%	38.94%	0.428	0.581
153	153	33.4%	65.15%	0.619	0.646
153	171	36.1%	38.61%	0.325	0.586
153	172	8.1%	27.69%	0.273	0.582
153	173	21.4%	35.38%	0.376	0.616

# Appendix D

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**Lisa R. Handley**  
CURRICULUM VITAE

## **Professional Experience**

Dr. Handley has over thirty years of experience in the areas of redistricting and voting rights, both as a practitioner and an academician, and is recognized nationally and internationally as an expert on these subjects. She has advised numerous clients on redistricting and has served as an expert in dozens of redistricting and voting rights court cases. Her clients have included the U.S. Department of Justice, civil rights organizations, independent redistricting commissions and scores of state and local jurisdictions. Internationally, Dr. Handley has provided electoral assistance in more than a dozen countries, serving as a consultant on electoral system design and redistricting for the United Nations, UNDP, IFES, and International IDEA. In addition, Dr. Handley served as Chairman of the Electoral Boundaries Commission in the Cayman Islands.

Dr. Handley has been actively involved in research, writing and teaching on the subjects of redistricting and voting rights. She has co-written a book, Minority Representation and the Quest for Voting Equality (Cambridge University Press, 1992) and co-edited a volume (Redistricting in Comparative Perspective, Oxford University Press, 2008) on these subjects. Her research has also appeared in peer-reviewed journals such as *Journal of Politics*, *Legislative Studies Quarterly*, *American Politics Quarterly*, *Journal of Law and Politics*, and *Law and Policy*, as well as law reviews and edited books. She has taught political science undergraduate and graduate courses related to these subjects at several universities including the University of Virginia and George Washington University. Dr. Handley is a Visiting Research Academic at Oxford Brookes University in the United Kingdom.

Dr. Handley is the President of Frontier International Consulting, a consulting firm that specializes in providing electoral assistance in transitional and post-conflict democracies. She also works as an independent election consultant both in the United States and internationally.

## **Education**

Ph.D. The George Washington University, Political Science, 1991

## **Present Employment**

**President**, Frontier International Electoral Consulting LLC (since co-founding company in 1998).

**Senior International Electoral Consultant** Technical assistance for clients such as the UN, UNDP and IFES on electoral system design and boundary delimitation

**Visiting Research Academic**, Centre for Development and Emergency Practice (CENDEP), Oxford Brookes University



## **U.S. Clients since 2000**

American Civil Liberties Union – redistricting consultant, expert testimony in Ohio partisan gerrymander challenge and challenge to Commerce Department inclusion of citizenship question on 2020 census form

Lawyers Committee for Civil Rights Under Law – expert testimony in challenges to statewide judicial elections in Texas and Alabama

US Department of Justice – expert witness testimony in several Section 2 and Section 5 cases)

Alaska: Redistricting Board (2000 and 2010) – redistricting consultation, expert witness testimony

Arizona: Independent Redistricting Board (2000 and 2010) – redistricting consultation

Colorado: Redistricting Commission (2020), Redistricting Board (2000 and 2010) – redistricting consultation

Connecticut: State Senate and State House of Representatives (2000 and 2010) – redistricting consultation

Florida: State Senate (2000) – redistricting consultation

Kansas: State Legislative Research Department (2000, 2010, 2020) – redistricting consultation

Louisiana: Louisiana Legislative Black Caucus (2000) – expert witness testimony

Massachusetts: State Senate (2000 and 2010) – redistricting consultation

Maryland: Attorney General (2000) – redistricting consultation

Michigan: Redistricting Commission (2020) – redistricting consultation

Miami-Dade County, Florida: County Attorney (2000 and 2010) – redistricting consultation

Nassau County, New York: Redistricting Commission (2000) – redistricting consultation

New Mexico: State House (2000) – redistricting consultation, expert witness testimony

New York: State Assembly (2000), State Senate (2020) – redistricting consultation

New York City: Redistricting Commission and Charter Commission (2001, 2011) – redistricting consultation and Section 5 submission assistance

New York State Court: Expert to the Special Master (drew congressional lines for state court)

Rhode Island: State Senate and State House (2000 and 2020) – redistricting consultation

Vermont: Secretary of State (2000) – redistricting consultation

## International Clients since 2000

### United Nations

- Afghanistan – electoral system design and district delimitation expert
- Bangladesh (UNDP) – redistricting expert
- Sierra Leone (UNDP) – redistricting expert
- Liberia (UNMIL, UN peacekeeping mission) – redistricting expert
- Democratic Republic of the Congo (MONUC, UN peacekeeping mission) – election feasibility mission, electoral system design and redistricting expert
- Kenya (UN) – electoral system design and redistricting expert
- Haiti (UN) – election feasibility mission, electoral system design and redistricting expert
- Zimbabwe (UNDP) – redistricting expert
- Lead Writer on the topic of boundary delimitation (redistricting) for ACE (Joint UN, IFES and IDEA project on the Administration and Cost of Elections Project)

### International Foundation for Election Systems (IFES)

- Afghanistan – district delimitation expert
- Sudan – redistricting expert
- Kosovo – electoral system design and redistricting expert
- Nigeria – redistricting expert
- Nepal – redistricting expert
- Georgia – electoral system design and district delimitation expert
- Yemen – redistricting expert
- Lebanon – electoral system design and redistricting expert
- Malaysia – electoral system design and redistricting expert
- Myanmar – electoral system design and redistricting expert
- Ukraine – electoral system design and redistricting expert
- Pakistan – consultant for developing redistricting software
- Principal consultant for the Delimitation Equity Project – conducted research, wrote reference manual and developed training curriculum
- Writer on electoral boundary delimitation (redistricting), Elections Standards Project
- Training – developed training curriculum and conducted training workshops on electoral boundary delimitation (redistricting ) in Azerbaijan and Jamaica

### International Institute for Democracy and Electoral Assistance (International IDEA):

- Consultant on electoral dispute resolution systems
- Technology consultant on use of GIS for electoral district delimitation
- Training – developed training material and conducted training workshop on electoral boundary delimitation (redistricting ) for African election officials (Mauritius)
- Curriculum development – boundary delimitation curriculum for the BRIDGE Project

Other international clients have included The Cayman Islands; the Australian Election Commission; the Boundary Commission of British Columbia, Canada; and the Global Justice Project for Iraq.

## **Publications**

### ***Books:***

Does Torture Prevention Work? Liverpool University Press, 2016 (served as editor and author, with Richard Carver)

Comparative Redistricting in Perspective, Oxford University Press, 2008 (first editor, with Bernard Grofman).

Delimitation Equity Project: Resource Guide, Center for Transitional and Post-Conflict Governance at IFES and USAID publication, 2006 (lead author).

Minority Representation and the Quest for Voting Equality, Cambridge University Press, 1992 (with Bernard Grofman and Richard Niemi).

### ***Academic Journal Articles:***

"Drawing Electoral Districts to Promote Minority Representation" Representation, forthcoming, published online DOI:10.1080/00344893.2020.1815076.

"Evaluating national preventive mechanisms: a conceptual model," Journal of Human Rights Practice, Volume 12 (2), July 2020 (with Richard Carver).

"Minority Success in Non-Majority Minority Districts: Finding the 'Sweet Spot'," Journal of Race, Ethnicity and Politics, forthcoming (with David Lublin, Thomas Brunell and Bernard Grofman).

"Has the Voting Rights Act Outlived its Usefulness: In a Word, "No," Legislative Studies Quarterly, volume 34 (4), November 2009 (with David Lublin, Thomas Brunell and Bernard Grofman).

"Delimitation Consulting in the US and Elsewhere," Zeitschrift für Politikberatung, volume 1 (3/4), 2008 (with Peter Schrott).

"Drawing Effective Minority Districts: A Conceptual Framework and Some Empirical Evidence," North Carolina Law Review, volume 79 (5), June 2001 (with Bernard Grofman and David Lublin).

"A Guide to 2000 Redistricting Tools and Technology" in The Real Y2K Problem: Census 2000 Data and Redistricting Technology, edited by Nathaniel Persily, New York: Brennan Center, 2000.

"1990s Issues in Voting Rights," Mississippi Law Journal, 65 (2), Winter 1995 (with Bernard Grofman).

"Minority Turnout and the Creation of Majority-Minority Districts," American Politics Quarterly, 23 (2), April 1995 (with Kimball Brace, Richard Niemi and Harold Stanley).

"Identifying and Remedying Racial Gerrymandering," Journal of Law and Politics, 8 (2), Winter 1992 (with Bernard Grofman).

"The Impact of the Voting Rights Act on Minority Representation in Southern State Legislatures," Legislative Studies Quarterly, 16 (1), February 1991 (with Bernard Grofman).

"Minority Population Proportion and Black and Hispanic Congressional Success in the 1970s and 1980s," American Politics Quarterly, 17 (4), October 1989 (with Bernard Grofman).

"Black Representation: Making Sense of Electoral Geography at Different Levels of Government," Legislative Studies Quarterly, 14 (2), May 1989 (with Bernard Grofman).

"Minority Voting Equality: The 65 Percent Rule in Theory and Practice," Law and Policy, 10 (1), January 1988 (with Kimball Brace, Bernard Grofman and Richard Niemi).

"Does Redistricting Aimed to Help Blacks Necessarily Help Republicans?" Journal of Politics, 49 (1), February 1987 (with Kimball Brace and Bernard Grofman).

***Chapters in Edited Volumes:***

"Effective torture prevention," Research Handbook on Torture, Sir Malcolm Evans and Jens Modvig (eds), Cheltenham: Edward Elgar, 2020 (with Richard Carver).

"Redistricting" in Oxford Handbook of Electoral Systems, Erik Herron Robert Pekkanen and Matthew Shugart (eds), Oxford: Oxford University Press, 2018.

"Role of the Courts in the Electoral Boundary Delimitation Process," in International Election Remedies, John Hardin Young (ed.), Chicago: American Bar Association Press, 2017.

"One Person, One Vote, Different Values: Comparing Delimitation Practices in India, Canada, the United Kingdom, and the United States," in Fixing Electoral Boundaries in India, edited by Mohd. Sanjeer Alam and K.C. Sivaramakrishnan, New Delhi: Oxford University Press, 2015.

"Delimiting Electoral Boundaries in Post-Conflict Settings," in Comparative Redistricting in Perspective, edited by Lisa Handley and Bernard Grofman, Oxford: Oxford University Press, 2008.

"A Comparative Survey of Structures and Criteria for Boundary Delimitation," in Comparative Redistricting in Perspective, edited by Lisa Handley and Bernard Grofman, Oxford: Oxford University Press, 2008.

"Drawing Effective Minority Districts: A Conceptual Model," in Voting Rights and Minority Representation, edited by David Bositis, published by the Joint Center for Political and Economic Studies, Washington DC, and University Press of America, New York, 2006.

"Electing Minority-Preferred Candidates to Legislative Office: The Relationship Between Minority Percentages in Districts and the Election of Minority-Preferred Candidates," in Race and Redistricting in the 1990s, edited by Bernard Grofman; New York: Agathon Press, 1998 (with Bernard Grofman and Wayne Arden).

"Estimating the Impact of Voting-Rights-Related Districting on Democratic Strength in the U.S. House of Representatives," in Race and Redistricting in the 1990s, edited by Bernard Grofman; New York: Agathon Press, 1998 (with Bernard Grofman).

"Voting Rights in the 1990s: An Overview," in Race and Redistricting in the 1990s, edited by Bernard Grofman; New York: Agathon Press, 1998 (with Bernard Grofman and Wayne Arden).

"Racial Context, the 1968 Wallace Vote and Southern Presidential Dealignment: Evidence from North Carolina and Elsewhere," in Spatial and Contextual Models in Political Research, edited by Munroe Eagles; Taylor and Francis Publishing Co., 1995 (with Bernard Grofman).

"The Impact of the Voting Rights Act on Minority Representation: Black Officeholding in Southern State Legislatures and Congressional Delegations," in The Quiet Revolution: The Impact of the Voting Rights Act in the South, 1965-1990, eds. Chandler Davidson and Bernard Grofman, Princeton University Press, 1994 (with Bernard Grofman).

"Preconditions for Black and Hispanic Congressional Success," in United States Electoral Systems: Their Impact on Women and Minorities, eds. Wilma Rule and Joseph Zimmerman, Greenwood Press, 1992 (with Bernard Grofman).

***Electronic Publication:***

"Boundary Delimitation" Topic Area for the Administration and Cost of Elections (ACE) Project, 1998. Published by the ACE Project on the ACE website ([www.aceproject.org](http://www.aceproject.org)).

***Additional Writings of Note:***

Amicus brief presented to the US Supreme Court in Gill v. Whitford, Brief of Political Science Professors as Amici Curiae, 2017 (one of many social scientists to sign brief)

Amicus brief presented to the US Supreme Court in Shelby County v. Holder, Brief of Historians and Social Scientists as Amici Curiae, 2013 (one of several dozen historians and social scientists to sign brief)

Amicus brief presented to the US Supreme Court in Bartlett v. Strickland, 2008 (with Nathaniel Persily, Bernard Grofman, Bruce Cain, and Theodore Arrington).



## Recent Court Cases

Pending cases:

- Arkansas State Conference NAACP et al. v. Arkansas Board of Apportionment et al. (Case Number: 4:21-cv-01239-LPR) (Eastern District of Arkansas)
- League of Women Voters of Ohio et al. v. Ohio Redistricting Commission et al. (Case Number: 2021-1193) (Supreme Court of Ohio)
- League of Women Voters of Ohio et al. v. Governor DeWine (Case Number: 2021-1449) (Supreme Court of Ohio)

Ohio Philip Randolph Institute v. Larry Householder (2019) – partisan gerrymander challenge to Ohio congressional districts; testifying expert for ACLU on minority voting patterns

State of New York v. U.S. Department of Commerce/ New York Immigration Coalition v. U.S. Department of Commerce (2018-2019) – challenge to inclusion of citizenship question on 2020 census form; testifying expert on behalf of ACLU

U.S. v. City of Eastpointe (settled 2019) – minority vote dilution challenge to City of Eastpointe, Michigan, at-large city council election system; testifying expert on behalf of U.S. Department of Justice

Alabama NAACP v. State of Alabama (decided 2020) – minority vote dilution challenge to Alabama statewide judicial election system; testifying expert on behalf of Lawyers Committee for Civil Rights Under Law

Lopez v. Abbott (2017-2018) – minority vote dilution challenge to Texas statewide judicial election system; testifying expert on behalf of Lawyers Committee for Civil Rights Under Law

Personhuballuah v. Alcorn (2015-2017) – racial gerrymandering challenge to Virginia congressional districts; expert for the Attorney General and Governor of the State of Virginia

Perry v. Perez (2014) – Section 2 case challenging Texas congressional and state house districts; testifying expert for the U.S. Department of Justice

Jeffers v. Beebe (2012) – Arkansas state house districts; testifying expert for the Plaintiffs

State of Texas v. U.S. (2011-2012) – Section 5 case challenging Texas congressional and state house districts; testifying expert for the U.S. Department of Justice

In RE 2011 Redistricting Cases (2011-2012) – State legislative districts for State of Alaska; testifying expert for the Alaska Redistricting Board

# EXHIBIT C

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**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA**

**ATLANTA DIVISION**

ALPHA PHI ALPHA FRATERNITY INC., et  
al.;

*Plaintiffs,*

vs.

BRAD RAFFENSPERGER, in his official  
capacity as Secretary of State of Georgia.

*Defendant.*

Case No. 1:21-cv-05337-SCJ

**DECLARATION OF DR. ADRIENNE JONES**  
**PRELIMINARY REPORT**

**January 13, 2022**

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## BACKGROUND AND QUALIFICATIONS

I am a political scientist and lawyer by education and training. I am an Assistant Professor of Political Science at Morehouse College in Atlanta, Georgia, and I teach political science and serve as the Pre-Law Director. I have taught political science at the university level for 22 years, since 1999.

I obtained a Ph.D. and M.Phil from the City University of New York Graduate Center. My primary Ph.D. training was in American Politics, with a minor in public policy. I also obtained a J.D. from the University of California at Berkeley School of Law. In addition to Morehouse College where I currently teach, I have taught at: The City College of New York, The Center for Workers Education, The University of Wisconsin at Platteville, and Radford University.

I have particular expertise in the history of racial discrimination in voting and the Voting Rights Act of 1965, 52 U.S.C. § 10301, et seq. (VRA). My doctoral dissertation titled, *The Voting Rights Act Under Siege: The Development of the Influence of Colorblind Conservatism on the Federal Government and the Voting Rights Act* presents my research on the VRA between 1965 and 2013. I have published two peer-reviewed articles on the VRA, *When Yes Means No: GOP Congressional Strategy and the Reauthorization of the VRA in 2006*, and *How to Win a "Long Game": The Voting Rights Act, the Republican Party, and the Politics of Counter-Enforcement* in Political Science Quarterly. I have also published lay opinion pieces about the VRA and Black American history and politics. I have made presentations on the same topics, including on the VRA at the Southern Political Science Association. My C.V. lists both my presentations and publications, and is included in the Appendix to this report. At present, I am writing articles and a book on the VRA based on my doctoral dissertation.

As a political science professor, I am regarded as the public law expert in my department. My courses are based in American Government, public policy, and law. These courses include, but have not been limited to, National Government, Constitutional Law I and II, Race and Law, Issues in Civil and Criminal Law, and similar courses. Presently, at Morehouse College, I teach Race and Law, National Government, Constitutional Law, and the Senior Seminar. I also serve as the campus pre-law director.

I am serving as an expert witness in *Fair Fight Action v. Raffensperger*, 1:18-cv-05391 (N.D. Ga. 2019) as an expert on the history of voter suppression in Georgia. In that case, the Court qualified me as an expert to testify about the history of voter suppression in Georgia. *Fair Fight Action v. Raffensperger*, 1:18-cv-05391 (N.D. Ga. 2019), Dkt. 577 at 11.

For my work in this case, I am being compensated \$300 per hour. My compensation is not contingent on the analysis and opinions offered or on the outcome of this litigation.



## STATEMENT OF PURPOSE

I have been asked by plaintiffs’ counsel in this case to examine any relevant historical and contemporary evidence of certain social and historical factors, and how, if at all, these factors impair Black voters’ ability to participate fully and equally in the political process and to elect candidates of their choice.

Specifically, I have focused my analysis on several factors set forth by the U.S. Senate Judiciary Committee during the amendment of Section 2 of the Voting Rights Act in 1982 and subsequently referenced by the Supreme Court in *Thornburg v. Gingles*, 478 U.S. 30 (1986) (the “Senate Factors”). My report focuses on Senate Factors 1, 3, 6, and 7, which are:

- **Factor 1:** The “extent of any history of official discrimination in the state or political subdivision that touched the right of the members of the minority group to register, to vote, or otherwise to participate in the democratic process.”
- **Factor 3:** The “extent to which the state or political subdivision has used unusually large election districts, majority vote requirements, anti-single shot provisions, or other voting practices or procedures that may enhance the opportunity for discrimination against the minority group.”
- **Factor 6:** Whether “political campaigns have been characterized by overt or subtle racial appeals.”
- **Factor 7:** The “extent to which members of the minority group have been elected to public office in the jurisdiction.”

In conducting my analysis and reaching the opinions contained in this report, I have objectively examined different types of sources—including the legislative and judicial record, newspaper coverage, campaign literature, and public statements, along with the existing scholarship and the established historical background—to learn and describe the history of Georgia and its official relationship to Black voter access historically, to determine the practices that create barriers for Black voters to participate in elections in Georgia as voters and as candidates. Additionally, I examined Georgia’s state Senate and House districting maps and historical election data, amongst other sources, to evaluate the degree to which Blacks have been elected to office.<sup>1</sup> I have weighed all of that material collectively in forming my opinions.

I have directed my research assistant, Andrea Evans, to assist me in this assignment on compiling and analyzing data pursuant to my instructions and supervision, particularly related to Senate Factor 7.

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<sup>1</sup> See Part III, *infra*, for a more detailed description.

## SUMMARY OF OPINIONS

My major opinions are summarized briefly as follows:

Factor 1: Georgia has an undisputed history of discrimination against Black citizens with regard to the franchise, in particular but not limited to Black citizens registering to vote and voting. The state has used traditional Jim Crow tactics including, poll taxes, literacy and understanding tests, the white primary, and the County Unit System.

Factor 3: Georgia has made significant use of voting practices and procedures that enhance the opportunity for discrimination against Black Georgians. Georgia has used, and continues to use, at large voting systems, majority vote requirements and numbered posts, redistricting, restrictions on running for office, felony disenfranchisement, which all enhance the opportunity to dilute the votes of Black citizens. Georgia has also used numerous practices in regulating voter registration (including voter purges, Exact Match, and where voter registration services are offered) and practices regarding the time, locations, and manner of registration and voting, which disproportionately impact Black voters. Many voting practices exercised by Georgia have routinely been adopted with the intention to ensure the ability to limit Black citizen access to the ballot box and to elected office. But regardless of intent, these are voting practice and procedures that disproportionately restrict Black voter access affect the ability of Black people in Georgia to participate equally.

Black citizens have not enjoyed the assumption that they have the right to vote or that the right is sacrosanct because the state has routinely used methods listed in Factor 3.

Factor 6: Political campaigns have historically and presently been characterized by overt and subtle racial appeals. Traditionally explicit racial appeals were made in political campaigns during Constitutional debate and campaigns for public office. Before 1966, every Georgia governor ran on a platform that included blatantly racist, anti-Black appeals. Since the 1970s, the popularity of blatant appeals has receded and so political campaigns have engaged in both explicit appeals and *implicit* appeals, i.e., dog-whistle politics, to galvanize and mobilize white voters in the state. Racial appeals are de rigueur, and effective in political campaigns in the state.

Factor 7:

Black Georgians have been and continue to be underrepresented in public office. Despite persistently making up a significant portion of the state population, Georgia Blacks have faced barriers to being elected to public office, both historically and contemporarily. Since 1965, out of the 365 total seats in the U.S. Congress allocated to Georgia, only 12, or 3.28%, have been occupied by Black officials. At the state level, only two Black people have been elected to non-judicial statewide office in its entire 233 years. There are, moreover, areas in the state, including areas that are at issue in this lawsuit, that have not elected any Black officials to the Georgia Assembly for at least the last fifteen years (the time period of my analysis given the availability of publicly available districting maps).

## DISCUSSION

### I. The State of Georgia Has a History of Official Discrimination in Voting and Has Used a Bevy of Methods that Hinder Black Georgians' Ability to Participate in the Political Process (Factors 1 and 3)

Courts have repeatedly recognized Georgia's long history of official discrimination in voting.

Georgia's history of discrimination "has been rehashed so many times that the Court can all but take judicial notice thereof. Generally, Georgia has a history chocked full of racial discrimination at all levels. This discrimination was ratified into state constitutions, enacted into state statutes, and promulgated in state policy. Racism and race discrimination were apparent and conspicuous realities, the norm rather than the exception."

*Wright v. Sumter Cty. Bd. of Elections & Registration*, 301 F. Supp. 3d 1297, 1310 (M.D. Ga. 2018) (quoting *Brooks v. State Bd. of Elections*, 848 F. Supp. 1548, 1560 (S.D. Ga. 1994)), *aff'd*, 979 F.3d 1282 (11th Cir. 2020); *Ga. State Conf. of the NAACP v. Fayette Cty. Bd. of Comm'rs*, 950 F. Supp. 2d 1294, 1314 (N.D. Ga. 2013) (recognizing "Georgia's undisputed history of discrimination"), *aff'd in part, vacated in part, rev'd in part and remanded*, 775 F.3d 1336 (11th Cir. 2015); *see also Johnson v. Miller*, 864 F. Supp. 1354, 1379–80 (S.D. Ga. 1994) ("[W]e have given formal judicial notice of the State's past discrimination in voting, and have acknowledged it in the recent cases."), *aff'd and remanded sub nom. Miller v. Johnson*, 515 U.S. 900 (1995).

In the nine decades from the end of Reconstruction through the passage of the Voting Rights Act in 1965, Georgia emerged as the leader of state-sponsored voter suppression. During this period, Georgia state and local officials "adopted virtually every one of the traditional 'expedients' to obstruct the exercise of the franchise by blacks, including literacy and understanding tests, the poll tax, felony disenfranchisement laws, onerous residency requirements, cumbersome registration procedures, voter challenges and purges, the abolition of elective offices, the use of discriminatory redistricting and apportionment schemes, the expulsion of elected blacks from office, and the adoption of primary elections in which only whites were allowed to vote."<sup>2</sup> It is no surprise that legal experts have observed that "No state was more systematic and thorough in its efforts to deny or limit voting and office holding by blacks" than Georgia.<sup>3</sup>

Much has changed since the Jim Crow era, but that past remains with us today. As a scholar whose work is focused on the 1965 Voting Rights Act, I will focus my discussion here primarily on the particular forms and instances of official election and voting-related discrimination in Georgia that have persisted in the modern period, defined as the period starting from the 1960s to the present. In doing so, however, I will also highlight the ways in which the devices and mechanisms that have burdened Black political participation in more recent times often have their roots in the more explicit discriminatory measures of Jim Crow.

<sup>2</sup> McDonald, Laughlin. *A Voting Rights Odyssey: Black Enfranchisement in Georgia*. Cambridge University Press, 2003, 3.

<sup>3</sup> McDonald, *Odyssey*, 2.

## A. The Voting Rights Act and New Measures to Suppress and Dilute the Black Vote.

### 1) Persistent Resistance to the Voting Rights Act

Considered the crown jewel of civil rights legislation,<sup>4</sup> the VRA was designed to solve the problem of Black voter access and exclusion of Black Americans from the polity. Georgia resisted the VRA from its inception. When the VRA of 1965 was being debated in Congress, Georgia representatives complained vehemently that the law was an inappropriate imposition on states' sovereignty. Then-Georgia Governor Carl Sanders wrote to President Lyndon B. Johnson "urging defeat of the voting rights bill."<sup>5</sup> In his nine-page letter, Sanders argued that states determine all aspects of voting. He objected to the prohibition of literacy tests, and called the empowerment of federal registrars "extreme." Overall, Sanders considered the VRA "unnecessary," despite the state's culture of voter discrimination or, more accurately, because of it.<sup>6</sup>

Once the VRA passed, Georgia joined as a plaintiff with South Carolina in a lawsuit attacking the constitutionality of the VRA.<sup>7</sup> When the lawsuit failed, Georgia simply refused to comply with the law generally and with the preclearance process specifically for almost a decade and half.<sup>8</sup>

In the early years of VRA enforcement, Georgia refused to submit new laws for preclearance. Between 1965 and 1967, the state submitted exactly *one* of its hundreds of voting law changes to the U.S. Department of Justice ("DOJ") for preclearance.<sup>9</sup> And, the state resisted the requirements to ensure registration and ballot casting by all state citizens. A 1968 report of the U.S. Commission on Civil Rights reported that in 34 counties in Georgia, fewer than 10% of Black citizens were registered. In the state's 21 counties with Black voting age majorities, an average of only 15% of Black Georgians were registered, compared to 91% of whites.<sup>10</sup> By 1982, preclearance compliance by the state had improved but approximately 361 acts of the General Assembly and an unknown number of local changes went unsubmitted.<sup>11</sup> And when Georgia submitted voting changes for preclearance it still drew 226 objections from DOJ for

<sup>4</sup> Herbert H. Denton, *Reagan Signs Voting Rights Act Extension*, WASH. POST, June 30, 1982, <https://www.washingtonpost.com/archive/politics/1982/06/30/reagan-signs-voting-rights-act-extension/b59370f1-fc93-4e2f-b417-2b614ea55910/> (quoting President Reagan as calling the right to vote "the crown jewel of American liberties").

<sup>5</sup> McDonald, *Odyssey*, 3.

<sup>6</sup> McDonald, *Odyssey*, 11-12.

<sup>7</sup> See Brief on Behalf of the State of Georgia, 1965 WL 115335, *South Carolina v. Katzenbach*, 383 U.S. 301 (1966).

<sup>8</sup> U.S. Department of Justice, "Number of Changes Submitted under Section 5 and Reviewed by the Department of Justice, by State and Year, 1965-December 31, 1980."

<sup>9</sup> U.S. Department of Justice, "Number of Changes Submitted under Section 5 and Reviewed by the Department of Justice, by State and Year, 1965-December 31, 1980."

<sup>10</sup> U.S. Commission on Civil Rights, *Political Participation* (Washington, D.C. Government Printing Office, 1968), pp. 232-39.

<sup>11</sup> McDonald, *Odyssey*, 175.

noncompliance between 1965-1981 (or almost 1/3 of the *all* of DOJ objections for all states during that time period).<sup>12</sup>

Even through the most-recent reauthorization of the VRA, Georgia continued to oppose the legislation. In 2006, Georgia Congressional representatives took the lead in opposing reauthorization of the temporary provision of the VRA in particular, Section 5 and preclearance. After the two parties agreed to renew the Act “as is,” Georgia Representative Lynn Westmoreland led colleagues in a demand for debate to express on the record their opposition to the VRA and to preclearance in particular. Despite the assertion by Westmoreland and the “Rebels” that preclearance was no longer necessary,<sup>13</sup> Georgia’s submissions to the DOJ continued to be met with objections for failing to show that a submitted change has neither a discriminatory purpose nor a discriminatory effect.<sup>14</sup>

Georgia’s resistance to the VRA is consistent with its history of resisting the expansion of voting rights to Black citizens at every turn. Just two years after Georgia was re-admitted to the Union following the Civil War, it was again evicted when the legislature expelled its Black elected officials.<sup>15</sup> As soon as the Reconstruction period closed in 1877, Georgia adopted a new Constitution, and officially imposed barriers to Black voters yet *again*.<sup>16</sup> As Justice Ginsburg described:

After a brief interlude of black suffrage enforced by federal troops but accompanied by rampant violence against blacks, Georgia held a constitutional convention in 1877. Its purpose, according to the convention's leader, was to “fix it so that the people shall rule and the Negro shall never be heard from.” In pursuit of this objective, Georgia enacted a cumulative poll tax, requiring voters to show they had

<sup>12</sup> Laughlin McDonald. “Voting Rights in the South: Ten Years of Challenging Continuing Discrimination Against Minorities.” Atlanta: ACLU, Southern Regional Office, 1982, 24-25.

<sup>13</sup> Wallsten, Peter, and Johanna Neuman. “Voting Rights Act Renewal Divides GOP.” *Los Angeles Times*, July 12, 2006. <https://www.latimes.com/archives/la-xpm-2006-jul-12-na-voting12-story.html>. (describing Westmoreland as complaining that the VRA “unfairly targeting his home region because of its past -- and failing to account for progress in racial relations” and also acknowledging that he would “feel fine” if preclearance was not reauthorized).

<sup>14</sup> See, e.g., Thomas E. Perez, U.S. Assistant Attorney Gen. to Dennis R. Dunn, Ga. Deputy Attorney Gen. (Dec. 21, 2012) (objecting to state legislation moving the election date for mayoral and commissioner elections for the consolidated government of Augusta-Richmond from November to July as DOJ’s analysis found it would a retrogressive effect on the ability of minority voters to elect candidates of choice to office and state did not show it was not motivated by a discriminatory purpose); Thomas E. Perez, U.S. Assistant Attorney Gen. to Andrew S. Johnson, Arnold, Stafford, & Randolph & B. Jay Swindell, McCullough & Swindell (Aug. 27, 2012) (objection to redistricting plan for the Board of Education and Board of Commissioners for Long County, Georgia, which would need to be approved by the state, because the under the proposed plan African American voters experience avoidable retrogression of their ability to elect candidate their choice); Loretta King, Acting Assistant Attorney Gen. to Thurbert E. Baker, Georgia Attorney Gen. (May 29, 2009) (objecting to exact match voter registration protocol).

<sup>15</sup> United States Statutes at Large, 41 Cong. Ch. 299, July 15, 1870, 16 Stat. 363-64; Gabriel J. Chin, “The Voting Rights Act of 1867: The Constitutionality of Federal Regulation of Suffrage during Reconstruction,” 82 N.C. L. Rev. 1581 (2004); McDonald, *Odyssey*, 24.

<sup>16</sup> McDonald, *Odyssey*, 36-37.



paid past as well as current poll taxes; one historian described this tax as the “most effective bar to Negro suffrage ever devised.”<sup>17</sup>

Other mechanisms were also introduced with the explicit aim of resisting the expansion of voting rights to Black citizens. In 1890, the Georgia state legislature gave political parties the exclusive power to regulate and conduct primary elections.<sup>18</sup> And in 1894, the legislature adopted a law which required the racial designation of voters.<sup>19</sup> In 1900, the Georgia Democratic Party adopted rules limiting voting in all state primaries to whites.<sup>20</sup> Georgia continued to use a whites-only Democratic primary and defend that practice in courts,<sup>21</sup> even several years after the U.S. Supreme Court’s 1944 *Smith v. Allright* ruling that the conduct of primary elections is a “state function” (that should not violate the 15th Amendment).<sup>22</sup> And after the passage of the Civil Rights Act of 1957, one of the federal government’s first major pieces of legislation protecting Black voting rights, the Georgia General Assembly responded by adopting a resolution by unanimous vote calling for the repeal of the Fourteenth and Fifteenth Amendments because they were “malignant acts of arbitrary power” and “are null and void and of no effect.”<sup>23</sup> Then in 1958, Georgia adopted a more difficult voter registration test.<sup>24</sup>

## 2) At-Large Voting Systems

Key to Georgia’s resistance to expansion of the franchise to Black citizens after the passage of the VRA was a widespread shift to at-large election schemes by local governments and school boards. At-large voting systems, where all voters cast their ballots for all candidates in the jurisdiction, can dilute Black votes, even where large numbers of Black citizens are registered to vote. This is because Black voters who could constitute a majority of a would-be district often do not have sufficient numbers to constitute a majority across at-large jurisdictions, which combine districts. Thus, the state, by passing legislation which authorized at-large schemes, facilitated local jurisdictions blocking Black voters from electing their preferred candidates by submerging them in white majorities.<sup>25</sup> As the Supreme Court observed in holding that Section 5 of the VRA was applicable to a change from district to at-large voting for county supervisors: “Voters who

<sup>17</sup> *Miller v. Johnson*, 515 U.S. 900, 936–37 (1995) (Ginsburg, J., dissenting) (quoting McDonald, Binford, & Johnson, Georgia, in *Quiet Revolution in the South* 68 (C. Davidson & B. Grofman eds. 1994) (quoting Robert Toombs) & A. Stone, *Studies in the American Race Problem* 354–355 (1908)).

<sup>18</sup> Ga. Laws 1890, p. 210.

<sup>19</sup> Ga. Laws 1894, pp. 1 15, 1 17.

<sup>20</sup> Numan v. Bartley, *The Creation of Modern Georgia*, (Athens: University of Georgia Press, 1983), p. 139.

<sup>21</sup> *King v. Chapman*, 62 F. Supp. 639 (M.D. Ga. 1945), *aff’d*, 154 F.2d 460 (5th Cir. 1946).

<sup>22</sup> 321 U.S. 649, 661 (1944) (overruling *Grovey v. Townsend*, 295 U.S. 45, 52-53 (1935), which had held that a Texas county clerk’s compliance with the Democratic party rule was not unconstitutional because there was no state action involved.).

<sup>23</sup> Ga. Laws 1957, p. 348.

<sup>24</sup> Ga. Laws 1958, p. 269. The test required voter registration applicants either pass a literacy test or correctly answer 20 of 30 questions. The questions included: “1. What is a republican form of government?”; “11. Who is the Solicitor General of the State Judicial Circuit in which you live and who is the Judge of such Circuit? (If such Circuit has more than one Judge, name them all.)”; “19. How does the Constitution of Georgia provide that a county site may be changed?” See Questions and Answers Under Section 19 of 1958 Registration law (Act. No. 321), <https://vault.georgiaarchives.org/digital/collection/adhoc/id/546/rec/6>.

<sup>25</sup> For example, the Georgia Assembly changed the law in 1972 so that the members of the Board of Commissioners of Wilkes County, Georgia “would be elected at large, while still required to reside in the districts previously used.” *Wilkes Cty., Ga. v. United States*, 450 F. Supp. 1171, 1173 (D.D.C.), *aff’d*, 439 U.S. 999 (1978).

are members of a racial minority might well be in the majority in one district, but in a decided minority in the county as a whole. This type of change could therefore nullify their ability to elect the candidate of their choice just as would prohibiting some of them from voting.”<sup>26</sup>

In relationship to districting and at-large voting systems, the Supreme Court’s 1973 decision, *White v. Regester*, “gave a huge boost to the voting rights enforcement campaign in Georgia.”<sup>27</sup> In *White*, the Supreme Court invalidated an at-large election district in Texas as unconstitutional based on a theory of vote dilution.<sup>28</sup> The Court held in *White* that single member districts were necessary to integrate Black voters and to allow them the potential to elect candidates of their choice.<sup>29</sup>

Subsequently, many challenges were filed in Georgia against the at-large jurisdiction systems used in county commission (including Burke, Morgan, Newton, Sumter, Richmond and Henry counties), boards of education (including Henry and Mitchell counties), and cities (including Waynesboro, Amreicus, and Covington) elections—none of which had been precleared by the Department of Justice.<sup>30</sup> Federal courts struck down a number of at-large systems challenged in court. In Fulton County, for example, a federal district court found that under the at-large voting system no Black representatives had been elected to the Fulton County Commission despite Black Georgians making up a “substantial minority population.”<sup>31</sup> Similar decisions applied to local government and school board lawsuits across the state.<sup>32</sup>

But the use of at-large districts, which can deprive Black voters of the opportunity to elect candidates of their choice, continues today. In 2015, Fayette County’s at large method of electing members to the Fayette County board of commissioners and board of education was enjoined by a federal district court for violating Section 2 of the VRA.<sup>33</sup> A Black candidate was elected to the Fayette County Board of Commissioners for the first time under the Court’s remedial plan.<sup>34</sup> See also discussion of recent example of the use of at-large districts for Sumter County school board, Part I.6.i., *infra*.

### 3) Majority Vote Requirements and Numbered Posts

Majority vote requirements and numbered posts were used by some of Georgia’s elected officials as a tactic that could be used to replace the impact of the infamous County Unit System, which had limited the ability of Black Georgians to elect a candidate of their choice.

Under the County Unit System, formally instituted in 1917, the 121 “rural” counties were each assigned 2 points, the 30 “town” counties were each granted 4 points, and the 8 “urban” counties were each granted 6 points. Most of the Black population in the state lived in town and urban

<sup>26</sup> *Allen v. State Bd. of Elections*, 393 U.S. 544, 569 (1969).

<sup>27</sup> McDonald, *Odyssey*, 159.

<sup>28</sup> *White v. Regester*, 412 U.S. 755, 770 (1973).

<sup>29</sup> *White v. Regester*, at 769.

<sup>30</sup> McDonald, *Odyssey*, 158-163.

<sup>31</sup> *Pitts v. Busbee*, 395 F. Supp. 35, 40-41 (N.D. Ga. 1975), *vacated on other grounds*, 536 F.2d 56 (5th Cir. 1976).

<sup>32</sup> McDonald, *Odyssey*, 160.

<sup>33</sup> *Georgia State Conference of NAACP v. Fayette Cty Bd. of Com’rs*, 118 F. Supp. 3d 1338, 1339 (N.D. Ga. 2015).

<sup>34</sup> *Georgia State Conference of NAACP*, 118 F. Supp. 3d at 1340.

counties. Because the 121 ruralities constituted a majority of the counties, the points accrued by rural counties trumped the ‘electoral’ shares of town and urban counties. A state-wide candidate who carried the Democratic primary with the most points, was elected.<sup>35</sup> The system was, as described by a federal court, “employed to destroy black voting strength.”<sup>36</sup> It was ultimately struck down by the Supreme Court in the 1963 decision *Gray v. Sanders*, which held that Georgia’s County Unit System violated the 14<sup>th</sup> Amendment Equal Protection Clause, and represented a failure of the “one person, one vote” imperative.<sup>37</sup>

The very next year, the Georgia legislature adopted a statewide comprehensive majority-vote requirement. The champion of enacting the requirement, Denmark Groover, was reported to have explained that “a majority vote would again provide protection which he said was removed with the death of the county unit system, indicating it would thwart election control by Negroes and other minorities.”<sup>38</sup> Before the Senate Rules Committee, Groover explained a majority vote requirement was necessary because “We have a situation when the federal government interceded to increase the registration of Negro voters.”<sup>39</sup>

Groover’s comments exposed the discriminatory effects that a facially race-neutral majority vote system brought about. Where there are more than two candidates running for a position, under a plurality-vote system, whoever gets the most votes wins. But under a majority-vote system, the two candidates who receive the most votes must have a runoff. That means that whenever a Black candidate runs for office, especially in instances where the Black candidate runs against two white candidates, white voters have the opportunity to coalesce around the white candidate at the run-off stage if the Black candidate had received a plurality in the general election. In *City of Rome, Georgia v. United States*, 446 U.S. 156, 183-84 (1980), the Supreme Court upheld a lower court’s finding that Rome, Georgia’s majority vote scheme “significantly” decreased the opportunity for a Black candidate to be elected in the situation described above. The Court explained that “even if [the Black candidate] gained a plurality of votes in the general election, [he] would still have to face the runner-up white candidate in a head-to-head runoff election in which, given bloc voting by race and a white majority, [he] would be at a severe disadvantage.”<sup>40</sup> Similarly, in *Rogers v. Lodge*, the majority vote requirement was found to “submerge the will of the minority” and thus “deny the minority’s access to the system.” 458 U.S. 613, 627 (1982). Cities across Georgia adopted majority vote requirements during the 1960s and 1970s, including Augusta, Athens, Camilla, Cochran, Crawfordville, Lumber City, Madison, and Waynesboro.<sup>41</sup>

<sup>35</sup> Buchanan, Scott. “County Unit System.” In *New Georgia Encyclopedia*, August 21, 2020.

<https://www.georgiaencyclopedia.org/articles/counties-cities-neighborhoods/county-unit-system>.

<sup>36</sup> *Busbee v. Smith*, 549 F. Supp. 494, 499 (D.D.C. 1982), *aff’d*, 459 U.S. 1166 (1983).

<sup>37</sup> 372 U.S. 368, 381 (1963).

<sup>38</sup> Kousser, J. Morgan, *Colorblind Injustice: Minority Voting Rights and the Undoing of the Second Reconstruction*. University of North Carolina Press, 1999, 229.

<sup>39</sup> *Id.* The legislation that passed the Georgia Assembly and became law in 1964 was separately introduced and had the support of an “Election Laws Study Committee,” both required a majority vote in primaries and general elections for all, or nearly all, local and state offices. *Id.* at 228.

<sup>40</sup> *City of Rome v. United States*, 446 U.S. 156, 184 (1980) (quoting *City of Rome, Ga. v. United States*, 472 F. Supp. 221, 244 (D.D.C. 1979)).

<sup>41</sup> McDonald, *Odyssey*, 143-144.

Majority vote and number posts requirements continue to be used in Georgia today.<sup>42</sup> As the DOJ explained, in the context of objecting to a change to a majority vote requirement for city council in the City of Tignall in Wilkes County: “Minority candidates who are forced into head-to-head contests with white candidates in [a] racially polarized voting environment are more likely to lose than would be the case under the existing system with concurrent terms and a plurality vote requirement.”<sup>43</sup>

The legislation enacting a majority-vote requirement statewide was accompanied by a numbered-post requirement—meaning that candidates for seats on multi-seat bodies are required to run for specific seats.<sup>44</sup> The Supreme Court affirmed the district court’s finding in *Rogers v. Lodge*, that such a “requirement that candidates run for specific seats . . . prevents a cohesive political group from concentrating on a single candidate,” and thus “minimize[s] the voting strength of racial minorities.”<sup>45</sup>

#### 4) Redistricting

While under the auspices of the VRA’s preclearance regime, Georgia deliberately used discriminatory districting maps to limit the Black vote. One such example of this was in 1971, when the state made new districts for Congress. The plan divided Black Atlanta into three districts, making the traditionally Black 5<sup>th</sup> district into a majority white one. The plan specifically excluded the residences of Andrew Young and Maynard Jackson, two Black candidates for Congress, to prevent them from running, but included the residences of several potential white 5<sup>th</sup> District candidates. White state legislators drummed up support for the plan by threatening that, if the 5<sup>th</sup> district maintained a Black majority, it was highly likely that Julian Bond, another potential Black candidate would be elected to Congress.<sup>46</sup> Georgia representatives insisted that the proposed districting plan was necessary to protect the state, despite its severely irregular shape. When Georgia sought to have the district plan precleared, the federal government objected, forcing the state to return Young and Jackson’s residences to the 5<sup>th</sup> district and to increase the Black percentage in the 5<sup>th</sup> district from 38% to 44%. In 1972 under the revised redistricting plan, Andrew Young was elected, making him “the first black person elected to Congress from Georgia since Reconstruction.”<sup>47</sup>

Georgia’s 1981 redistricting plans again drew objections including the plans for congressional, state and local redistricting. In a repeat of the antics of the early 1970s, white legislators rejected the plan proposed by the Black politician from Fulton County, Julian Bond, in favor of a plan that would maintain white majority voting strength.<sup>48</sup> Julian Bond’s proposed plan to increase the percentage of the Black vote in the 5<sup>th</sup> Congressional district to 69% was rejected. Legislators

<sup>42</sup> Ga. Code Ann. § 21-2-501 (providing “no candidate shall be nominated...or elected to public office ...unless such candidate shall have received a majority of the votes cast” with certain exceptions).

<sup>43</sup> Letter to Melvin P. Kopecky, Kopecky & Roberts from Bill Lann Lee, U.S. Acting Assistant Attorney General to (Mar. 17, 2000), [https://www.justice.gov/crt/records/vot/obj\\_letters/letters/GA/GA-2640.pdf](https://www.justice.gov/crt/records/vot/obj_letters/letters/GA/GA-2640.pdf).

<sup>44</sup> McDonald, *Odyssey*, 99.

<sup>45</sup> 458 U.S. at 627.

<sup>46</sup> McDonald, *Odyssey*, 149-150.

<sup>47</sup> Jones, Bartlett C., *Flawed Triumphs: Andy Young at the United Nations*, University Press of America, 1996, 3.

<sup>48</sup> *Busbee v. Smith*, 549 F. Supp. 494, 499 (D.D.C. 1982); McDonald, *Odyssey*, 168.

complained that the plan would cause white flight and racial discord.<sup>49</sup> Instead, white legislators submitted a plan that would reduce the power of Black voters in Fulton County.<sup>50</sup>

The resulting court challenge by Georgia to the Department of Justice denial of preclearance of the 1981 districting plan, is notable. The case was reviewed by the United States District Court for the District of Columbia.<sup>51</sup> The state argued its districting was driven by a desire to create a district for white “mountain counties . . . which were described as having peculiarly unified interests and concerns.”<sup>52</sup> The district court found that racial discrimination was the purpose of the 1981 plan, and it noted that the state treated Black and white districts which held unified interests, in a disparate manner. The court also made an explicit finding that the chair of the Georgia House appropriations committee, Joe Mack Wilson, who dominated the redistricting process in the lower chamber and who often expressed his hate for “blacks and Republicans,” was a “racist.”<sup>53</sup> Ultimately, the state districting plan included a 65% Black voting percentage in the 5<sup>th</sup> district. That plan resulted in the election of John Lewis to the 5th congressional in 1986 in a contest against Julian Bond.<sup>54</sup>

Unfortunately, the misuse of race in redistricting has continued into the 21st Century. Indeed, there is “compelling” evidence that “race predominated” the 2015-mid-decade redistricting of two house districts in the General Assembly.<sup>55</sup> *Atlanta Magazine* reported, “lawmakers decided to swap out heavily black and Latino areas” in, among others, a house district in Henry County, an area at issue in this case, “with nearby precincts that leaned Republican,” allowing a white Republican incumbent to “eke[] out a victory” two years later.<sup>56</sup> Henry County’s House District 111 was redistricted to decrease the Black share of the voting age population by “just over 2%,” which “likely changed the outcome of the 2016 election” because without the change, the district “would have become significantly more diverse.”<sup>57</sup> In 2016, the white Republican, Brian Strickland, defeated Black Democratic challenger, Darryl Payton by just 950 votes.<sup>58</sup>

## 5) New Restrictions on Running for Office

<sup>49</sup> *Busbee v. Smith*, 549 F. Supp. at 507, 510.

<sup>50</sup> McDonald, *Odyssey*, 169-173.

<sup>51</sup> *Busbee v. Smith*, 549 F. Supp. 494, 499 (D.D.C. 1982), *aff’d*, 459 U.S. 1166 (1983).

<sup>52</sup> *Busbee v. Smith*, 549 F. Supp. 494, 499 (D.D.C. 1982), *aff’d*, 459 U.S. 1166 (1983).

<sup>53</sup> *Busbee v. Smith*, 549 F. Supp. at 500.

<sup>54</sup> Dudley Clendinen, “Ex Colleague Upsets Julian Bond in Atlanta Congressional Runoff,” *The New York Times*, September 3, 1986.

<sup>55</sup> *Georgia State Conf. of NAACP v. Georgia*, 312 F. Supp. 3d 1357, 1365 (N.D. Ga. 2018).

<sup>56</sup> Thomas Wheatley, “How Redrawing Districts has Kept Georgia Incumbents in Power,” *Atlanta Magazine*, January 12, 2018. <https://www.atlantamagazine.com/news-culture-articles/redrawing-districts-kept-georgia-incumbents-power/>.

<sup>57</sup> *Georgia State Conf. of NAACP v. Georgia*, 312 F. Supp. 3d 1357, 1363 (N.D. Ga. 2018).

<sup>58</sup> “Georgia 111th District State house Results: Brian Strickland Wins,” *The New York Times*, August 1, 2017. <https://www.nytimes.com/elections/2016/results/georgia-state-house-district-111>; Nat’l Democratic Redistricting Committee “Eric Holder and Democrats begin redistricting wars in Georgia,” October 11, 2017. <https://democraticredistricting.com/eric-holder-and-democrats-begin-redistricting-wars-in-georgia>.

When this districting was later challenged as an unconstitutional racial gerrymander, the court found “compelling” evidence that race predominated in the drawing of those district lines, but ultimately denied a preliminary injunction because state officials had denied the use of race under oath, and binding Supreme Court case law created an especially elevated standard for establishing unconstitutional racial gerrymandering in the absence of direct evidence. *Georgia State Conf. of NAACP v. Georgia*, 312 F. Supp. 3d 1357, 1367 (N.D. Ga. 2018).



As part of its effort to prevent Black representation since passage of the VRA in 1965, the Georgia government has also arbitrarily changed the requirements for running for office. For example, in 1972, when John E. White, of Albany, Georgia, an employee of the Dougherty County Board of Education, announced that he would run for a seat in the Georgia House of Representatives, the first Black candidate to do so since Reconstruction, the Board adopted a new rule, “Rule 58”, the following month. Rule 58 required Board employees to take an unpaid leave of absence while running for or serving in a government office.<sup>59</sup> White subsequently ran for office three times and lost more than \$11,000 in unpaid salary as a result. White sued, arguing that Rule 58 had not been precleared under the VRA even though it was a “standard, practice or procedure with respect to voting,” enacted by a covered jurisdiction. White stressed that he was the first Black person to run for the General Assembly from the county and that no other Dougherty County employees had been subject to the same rule. Ultimately, the Supreme Court held that Rule 58 should have been submitted for preclearance. The Court enjoined application of the law and ordered preclearance compliance. The Court explained: “By imposing a financial loss on [Board] employees who choose to become candidates, [the Rule] makes it more difficult for them to participate in the democratic process and, consequently, restricts the field from which the voters may select their representatives.”<sup>60</sup>

#### **6) Official Elimination, Weakening or Increased Oversight of a Position After a Black Person is Elected.**

Another tactic that has long been used by Georgia government officials to dilute the power of Black voters is to respond to the election of a Black candidate in local government by weakening or eliminating the office to which the Black candidate was elected. In September of 1868, just a few months after Georgia ratified the 14<sup>th</sup> Amendment and elected a Republican governor, the state legislators (on a bipartisan basis) forcibly removed the identifiable Black legislators from the states house in 1868, save those who could not be identified “because their fair complexion (sic) made it impossible to prove that they were African American.”<sup>61</sup> These changes to local government entities and districts continue today.

##### *i. A School Board Example: Sumter County, Georgia*

The General Assembly has assisted counties in changing district lines when government entities like a school board, have become majority Black.

Sumter County is in Southwest Georgia. The County includes part of the city of Andersonville and the cities of Americus and Plains. Today, the population of Sumter County is 52.3% Black and 47.2% white. The Sumter County school population is 78% Black and 6 % white. The

<sup>59</sup> *Dougherty County, Georgia Bd. of Ed. v. White*, 439 U.S. 32, 34 (1978).

<sup>60</sup> *Id.* at 40.

<sup>61</sup> Franklin, John Hope, *Reconstruction and the Civil War*, University of Chicago Press, 1994, 130-131; *see also* Drago, Edmund L. *Black Politicians and Reconstruction in Georgia: A Splendid Failure*. University of Georgia Press, 1992, 69-70; *Georgia House Journal*, July 21, 1868, pp. 49-50; McDonald, *Odyssey*, 21.

disparity between the demographics of the county and the schools are, in part, attributable to the county's history of resisting school integration.<sup>62</sup>

When the Sumter County School Board became majority Black for the first time in 2010, the General Assembly approved a change proposed by the lame duck School Board that would reduce the size of the Board from nine members to seven, and make two of the seats on the Board at-large seats.<sup>63</sup> The Plaintiff brought suit, alleging that the new at-large seats and the packing of Black voters into two districts diluted Black voting strength. The Eleventh Circuit agreed with the district court's finding that this change violated Section 2 of the VRA.<sup>64</sup>

In addition to the attempted changes to the Sumter County School Board, county residents and white school board members also subjected the school board to unprecedented oversight designed to cast the school board as incompetent and justify the removal of the majority-Black board.<sup>65</sup> After a legal challenge,<sup>66</sup> the district court provided a districting plan for the school board that for the time being, will result in an opportunity for Sumter County's Black residents to equitably participate in the operation of the school board.<sup>67</sup>

ii. *A Black Mayor is Elected in Stockbridge*

Five months after the city of Stockbridge in Henry County, an area at issue in this case, elected its first Black mayor and an all-Black city council in 2017, the state legislature passed two bills allowing for Eagle's Landing, a whiter and wealthier community in Stockbridge, to break off and form its own city.<sup>68</sup> It would have become the first city in Georgia to be created by splitting from an existing city.<sup>69</sup> A former mayor of Stockbridge, Lee Stuart, who is white, publicly stated that

<sup>62</sup> Sumter County used a template established by the Sibley committee called the "school choice plan" which provided that local school systems be free to decide whether to integrate or not. See Bartley, *The Creation of Modern Georgia*, 195.

<sup>63</sup> *Wright v. Sumter Cty. Bd. of Elections & Registration*, 301 F. Supp. 3d 1297, 1304 (M.D. Ga. 2018), *aff'd*, 979 F.3d 1282 (11th Cir. 2020); H.B. 836 (2014) (enacted); H.B. 836 (2011).

<sup>64</sup> *Wright v. Sumter Cty. Bd. of Elections & Registration*, 301 F. Supp. 3d at 1326, *aff'd*, 979 F.3d 1282, 1287, 1297–98, 1311 (11th Cir. 2020).

<sup>65</sup> Casey, Nicholas. "A Voting Rights Battle in a School Board 'Coup.'" *The New York Times*, October 25, 2020, sec. U.S. <https://www.nytimes.com/2020/10/25/us/politics/voting-rights-georgia.html>.

<sup>66</sup> *Wright v. Sumter Cty. Bd. of Elections & Registration*, 979 F.3d 1282, 1287 (11th Cir. 2020).

<sup>67</sup> The current school board, elected in 2020 under the district map approved by the District Court, is for only the second time in history, majority Black. Former School Board member Kelvin Pless told the expert that in the last month or two, racial tension on the school board has again become apparent and has been covered in the Americus Times Recorder. See Tracey K. Hall, "A man in the arena: Jim Reid," *Americus Times Recorder*, December 28, 2021. <https://www.americustimesrecorder.com/2021/12/28/a-man-in-the-arena-jim-reid/>.

<sup>68</sup> Brentin Mock. "Is Atlanta's Cityhood Movement Spiraling Out of Control?" *Bloomberg CityLab*, April 16, 2018. <https://www.bloomberg.com/news/articles/2018-04-16/is-atlanta-s-cityhood-movement-spiraling-out-of-control>.

<sup>69</sup> Asia Ashley. "Stockbridge De-Annexation, Pro-Eagle's Landing Bill Heads to Governor." *Henry Herald*, March 6, 2018. [https://www.henryherald.com/news/stockbridge-de-annexation-pro-eagle-s-landing-bill-heads-to-governor/article\\_1a44e139-7a92-535f-8ea4-5232d2c4ed3f.html](https://www.henryherald.com/news/stockbridge-de-annexation-pro-eagle-s-landing-bill-heads-to-governor/article_1a44e139-7a92-535f-8ea4-5232d2c4ed3f.html).

some residents do not want to live in a city governed by an all-Black squad of officials.<sup>70</sup> The referendum was ultimately defeated, after a costly campaign by Stockbridge.<sup>71</sup>

### iii. *Removal of Black County Election Board Members*

Black county election board members have been removed across the State this year as a result of the General Assembly's repeated intervention in local election administration, including in areas like Spalding County, that are at issue in this case. In particular, the General Assembly has repeatedly passed county-specific legislation since 2021 altering the boards' operation. Most of the county-specific bills empower the local County Commission to purge the existing election board members and appoint new ones; one (in Spalding County) changed the rules so the decisive fifth board member is chosen by local judges instead of by a coin toss.<sup>72</sup>

H.B. 769, which passed the Georgia Assembly, "provid[ed] for the termination of the term of the present fifth member" of the board of elections for Spalding County, to be replaced by a fifth member "selected and appointed by the vote of a majority of judges of the Superior Court of Spalding County."<sup>73</sup> No Black person had ever served as a superior court judge of Spalding County. Until August 19, 2021, no Black person had served as a Superior Court judge for the Griffin Judicial Circuit covering Fayette, Pike, Spalding, and Upson counties.<sup>74</sup>

Those changes have resulted in the removal of a number of Black officials from county election boards. Indeed, Black county election board members have been a particular focus of this effort. As of June 2021, at least five of the ten county election board members removed from local boards have been people of color<sup>75</sup>—including and two Black board members in Morgan County, one of the areas of focus in this litigation.<sup>76</sup>

"County election boards have broad authority over voter access, such as polling locations and early-voting procedures."<sup>77</sup> These newly reconstructed boards have begun to make changes in the voting process that are likely to reduce the Black vote. For example, Spalding County ended Sunday voting for municipal elections, which had been "instrumental in boosting turnout of

<sup>70</sup> Mock, "Is Atlanta's Cityhood Movement Spiraling Out of Control?"

<sup>71</sup> See Leon Stafford, "Eagle's Landing secession attempt from Stockbridge defeated by voters," *The Atlanta Journal-Constitution*, November 6, 2018; Leon Stafford, "Stockbridge spent more than \$600,000 to defeat Eagle's Landing cityhood," *The Atlanta Journal-Constitution*, Nov. 28, 2018, [https://www.ajc.com/news/local-govt-politics/stockbridge-spent-more-than-600-000-defeat-eagle-landing-cityhood/S2TyIuEUyXEwIjctab6RtL/\\_](https://www.ajc.com/news/local-govt-politics/stockbridge-spent-more-than-600-000-defeat-eagle-landing-cityhood/S2TyIuEUyXEwIjctab6RtL/_)

<sup>72</sup> Oliphant, James, and Nathan Layne. "Georgia Republicans Purge Black Democrats from County Election Boards." *Reuters*, December 10, 2021, <https://www.reuters.com/world/us/georgia-republicans-purge-black-democrats-county-election-boards-2021-12-09/>.

<sup>73</sup> H.B. 769, Sec. 2(b) (2021).

<sup>74</sup> Cal Beverly, "Gov. Kemp Makes Historic Appointment to the Fayette Superior Court," *The Citizen*, July 20, 2021. <https://thecitizen.com/2021/07/20/gov-kemp-makes-historic-appointment-to-the-fayette-superior-court/>; 2001 Alumna, "Judge Rhonda Kreuziger, Appointed Griffin Judicial Circuit Superior Court Judge," John Marshall Law School, September 21, 2021, <https://www.johnmarshall.edu/2001-alumna-rhonda-kreuziger-appointed-griffin-judicial-circuit-superior-court-judge/>.

<sup>75</sup> Corasaniti, Nick, and Reid J. Epstein. "How Republican States Are Expanding Their Power Over Elections." *The New York Times*, June 19, 2021, sec. U.S. <https://www.nytimes.com/2021/06/19/us/politics/republican-states.html>.

<sup>76</sup> Oliphant and Layne. "Georgia Republicans Purge Black Democrats from County Election Boards."

<sup>77</sup> Oliphant and Layne, "Georgia Republicans Purge Black Democrats from County Election Boards."

Black voters in last year's [2020] election."<sup>78</sup> Sunday early voting has been especially important for congregants of Black churches such as Plaintiff AME Church, which regularly hold "Souls to the Polls" events after church services that help transport Black voters to the polls.<sup>79</sup> Finally, Lincoln County (north of Augusta, an area at issue in this case) is currently considering eliminating all but one of its polling locations.<sup>80</sup>

## 7) Felon Disenfranchisement

Felon disenfranchisement is one of the methods of voter suppression exercised by the state of Georgia since Reconstruction, when it was enshrined in Georgia's 1877 Constitution to counteract changes made during Reconstruction to grant rights to former slaves.<sup>81</sup> At the post-Civil War constitutional convention of October 1865, the all-white Georgia delegation codified the Georgia Black Codes, basing them on the colonial Slave Codes that regulated all aspects of Black enslaved people's lives, including prohibiting slaves from voting. Felony disenfranchisement laws have their roots in these Codes.<sup>82</sup> The Georgia Black Code applied indiscriminately to all Black people regardless of status, and it created a voting regime under which "the deprivation or loss of the vote would occur not at the ballot box at every election but at the point of registration and probably once."<sup>83</sup> A key mechanism of this regime comprised criminal exclusion laws that disqualified Black voters for the most minor of offenses. Georgia's 1877 Constitution facilitated this by providing: "no person who has been convicted of a felony involving moral turpitude may register, remain registered, or vote except upon completion of the sentence."<sup>84</sup>

Today in Georgia, that legacy continues. People convicted of felonies in Georgia lose the right to vote until they have completed their sentences, and that includes post release probation or parole periods and the payment of fees.<sup>85</sup> Georgia is 10<sup>th</sup> in the nation for incarceration and *first* for correctional supervision, i.e. probation and parole.<sup>86</sup> Probationary sentences in Georgia are on average 6.3 years which is essentially double the U.S. average.<sup>87</sup> The disenfranchisement due to this substantial carceral state continues to fall disproportionately on Black Georgians. Indeed, in

<sup>78</sup> Oliphant and Layne, "Georgia Republicans Purge Black Democrats from County Election Boards."

<sup>79</sup> Doubek, James, and Steve Inskeep. "Black Church Leaders in Georgia on the Importance of 'Souls to the Polls.'" *NPR*, March 22, 2021, <https://www.npr.org/2021/03/22/977929338/black-church-leaders-in-georgia-on-the-importance-of-souls-to-the-polls>

<sup>80</sup> *Id.*

<sup>81</sup> Georgia Const. of 1877 art. II, § I; *see also* McDonald, *Odyssey*, 36; Barrett Holmes Pitner, "How Georgia Will Use 'Moral Turpitude' to Strip Black People of their Votes in 2020," *Daily Beast*, June 3 2019. <https://www.thedailybeast.com/how-georgia-will-use-moral-turpitude-to-strip-black-people-of-their-votes-in-2020?ref=scroll>.

<sup>82</sup> Walton, Hanes, Jr., Sherman Puckett, and Donald Deskins. "Chapter 26: Felon and Ex-Felon Disenfranchisement: The Newest Technique of Vote Dilution and Candidate Diminution." In *The African American Electorate: A Statistical History*, 653–71, 655. Washington: CQ Press, 2012. <https://doi.org/10.4135/9781452234397>.

<sup>83</sup> *Id.* at 657.

<sup>84</sup> Georgia Const. of 1877 art. II, § I.

<sup>85</sup> Christopher Uggen, Ryan Larson, Sarah Shannon, and Arleth Pulido-Nava. "Locked Out 2020: Estimates of People Denied Voting Rights Due to a Felony Conviction." The Sentencing Project, October 15, 2020, 6. <https://www.sentencingproject.org/wp-content/uploads/2020/10/Locked-Out-2020.pdf>.

<sup>86</sup> Alexi Jones. "Correctional Control 2018: Incarceration and Supervision by State." Prison Policy Initiative, December 2018. <https://www.prisonpolicy.org/reports/correctionalcontrol2018.html>.

<sup>87</sup> "Georgia Council on Criminal Justice Reform." Council of State Governments Justice Center, July 2016.

2020, over *half* of the estimated 275,089 Georgians prevented from voting due to felony convictions are Black.<sup>88</sup> As of 2016, the state ranked 6<sup>th</sup> in the nation for largest population of disenfranchised Black voters.<sup>89</sup>

## **B. More Recent History: Laws and Official Practices with a Discriminatory Impact on Black Voters**

### **1) Exact Match Voter Registration Requirement**

The adoption of requirements that create barriers to voter registration is a tactic that state officials across the South, including in Georgia, have historically used to prevent Black citizens from having access to the ballot box. During the “Redeemer” period, “[m]any of the disenfranchising laws were designed expressly to be administered in a discriminatory fashion, permitting whites to vote while barring blacks. Small errors in registration procedures or marking ballots might or might not be ignored at the whim of election officials.”<sup>90</sup> In 1913, for example, Georgia passed a bill implementing a system of permanent registration, requiring all voters to submit to examination by a board of registrars,<sup>91</sup> where the board was often comprised of whites who were hostile to Black voting.

Policies which limit Black voters’ access to the ballot box through registration barriers continue today, even if the methods deployed by Georgia’s elections officials appear to be less hostile. Shortly before the 2008 presidential election, the Georgia Secretary of State’s office began implementing an automated voter registration verification protocol, which would later become known as “Exact Match,” without first obtaining preclearance from the DOJ.<sup>92</sup> The U.S. District Court for the Northern District of Georgia held that doing so violated Section 5 of the Voting Rights Act.<sup>93</sup> Georgia then filed for preclearance of its procedures.<sup>94</sup>

In 2009, the DOJ objected to Georgia’s implementation of a voter verification registration program which “seeks to match the information provided by the applicant with the information maintained by the state’s Department of Driver Services [DDS] and, in many cases, the federal Social Security Administration [SSA], and provides a list of those persons whose information does not match to local registrars,” and considers those individuals on that list to be not

<sup>88</sup> The Sentencing Project, “Locked Out 2020,” 17 Table 4 (52.29% of disenfranchised voters with felony convictions are Black).

<sup>89</sup> The Sentencing Project. “6 Million Lost Voters: State-Level Estimates of Felony Disenfranchisement, 2016.” Table 4: Estimates of Disenfranchised African Americans with Felony Convictions, 2016. Accessed December 30, 2021, <https://www.sentencingproject.org/publications/6-million-lost-voters-state-level-estimates-felony-disenfranchisement-2016/>.

<sup>90</sup> Keyssar, *The Right to Vote*, 112.

<sup>91</sup> Ga. Laws 1913, pp. 115-17.

<sup>92</sup> *Morales v. Handel*, No. 1:08-CV-3172, 2008 WL 9401054, at \*7 (N.D. Ga. Oct. 27, 2008); Order, *Fair Fight Action v. Raffensperger*, 1:18-CV-05391-SCJ (N.D. Ga.), ECF No. 636 at 6 (“The term ‘Exact Match’ means the voter verification program for voter registration application data, including citizenship status, used by the State of Georgia to meet the requirements of the Help America Vote Act”).

<sup>93</sup> *Morales v. Handel*, No. 1:08-CV-3172, 2008 WL 9401054, at \*8 (N.D. Ga. Oct. 27, 2008).

<sup>94</sup> *Id.*



registered to vote.<sup>95</sup> “Because the state implemented these changes in violation of Section 5,” the DOJ had “the actual results of the state's verification process.”<sup>96</sup> The DOJ’s analysis of the data found that it was “error-laden” and “impact of these errors falls disproportionately on minority voters.”<sup>97</sup> Specifically, the DOJ concluded “the different rate at which African American applicants are required to undertake an additional step before becoming eligible voters is statistically significant.”<sup>98</sup> After Georgia revised its verification process to include “daily monitoring of the voter verification process and prompt notice to applicants who could not be verified,” the DOJ indicated it would not object to the revised process.<sup>99</sup>

But an analysis of data provided by the Secretary of State’s office for July 2013 through July 2016 showed that the implementation of the revised Exact Match continued to create disproportionate barriers to voter registration for Black voters. 63.6% of the applications that were cancelled as a result of failure to match were from Black people; 13.6% were from white people.<sup>100</sup> And considering the impact of “Exact Match” leading to both cancelled and pending status applications, Black voter applicants were negatively impacted at *eight times* the rate of white voter applicants.<sup>101</sup> After the Georgia State Conference of the NAACP and others filed suit challenging the practice,<sup>102</sup> the Secretary of State agreed that anyone whose information did not meet the exact match would be placed on the “pending” list but permitted to vote on showing satisfactory identification without any obligation to cure.<sup>103</sup> Additionally, all applications that had been cancelled since October 1, 2013 were be restored to “pending,” allowing those more than 42,000 applicants<sup>104</sup> to finalize their registration and making them eligible to vote upon showing of satisfactory identification.<sup>105</sup>

In 2017, the state legislature passed a statute<sup>106</sup> implementing the same “exact match” policy the Secretary of State entered a settlement to stop using the year before (the settlement agreement bound the Secretary of State “[u]nless mandated by a future statutory requirement”<sup>107</sup>). This law like the previous iteration of this policy, required that a voter’s government issued ID must precisely match their names as listed on the Georgia voter rolls, so that a misspelled name, for example, can cause a no match result. Unsurprisingly, like the previous very similar iterations of the law, disproportionately affected minority voters, according to an analysis of data produced by the Georgia Secretary of State’s office showing that on July 4, 2018, approximately 51,111 voter

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<sup>95</sup> Letter to Thurbert E. Baker, Georgia Attorney General from Loretta King, Acting Assistant Attorney General at 2 (May 29, 2009)

<sup>96</sup> *Id.* at 3.

<sup>97</sup> *Id.*

<sup>98</sup> *Id.*

<sup>99</sup> Order, *Fair Fight Action v. Raffensperger*, 1:18-CV-05391-SCJ (N.D. Ga.), ECF No. 636 at 8.

<sup>100</sup> Complaint, *Georgia State Conference of the NAACP v. Kemp*, 2:16-cv-00219 (Sept 14, 2016), ECF No. 1, at paras. 86-90.

<sup>101</sup> *Id.* at para. 99.

<sup>102</sup> *Id.*

<sup>103</sup> Settlement Agreement, *Georgia State Conference of the NAACP v. Kemp*, 2:16-cv-00219, at 3 (Sept 14, 2016).

<sup>104</sup> Complaint, *Georgia State Conference of the NAACP v. Kemp*, 2:16-cv-00219, at 4 (Sept 14, 2016), ECF No. 1, at para. 7.

<sup>105</sup> Settlement Agreement, *Georgia State Conference of the NAACP v. Kemp*, 2:16-cv-00219, at 3 (Sept 14, 2016).

<sup>106</sup> HB 268 (2017)

<sup>107</sup> Settlement Agreement, *Georgia State Conference of the NAACP v. Kemp*, 2:16-cv-00219, at 2 (Sept 14, 2016).

registration applicants were “pending” for reasons related to the “exact match” protocol.<sup>108</sup> 80.15% of those pending applications were submitted by African-American, Latino and Asian-American applicants.<sup>109</sup> Only 9.83% of the “pending” for failure to verify applications were submitted by applicants identifying as white.<sup>110</sup>

The “exact match” law has changed since 2017,<sup>111</sup> but the current iteration, and its implementation, is the subject of ongoing litigation.<sup>112</sup> As part of this litigation, the Secretary of State’s “General Counsel has testified as follows: ‘of the [records] that failed verification, I would say our office was aware that it’s a largely African American population.’”<sup>113</sup>

## 2) Voter Purges

After *Shelby*, Georgia passed restrictions that would previously have required review by the Department of Justice. Between 2012 and 2016, the state purged 1.5 million voters, twice the number removed between 2008 and 2012.<sup>114</sup> An additional half a million were removed in 2017.<sup>115</sup> This purge of 500,000 voters in a single day, “may represent the <sup>116</sup>largest mass disenfranchisement in U.S. history.” Of 665,791 removed in 2017 overall, the vast majority--534,517—were removed for “No voting or other contact with election system in two campaign cycles.”<sup>117</sup>

Voter purges were historically used in Georgia to suppress Black voters. In 1946, former Georgia Governor Eugene Talmadge provided supporters a means of reducing the number of Black voters; in a newspaper article he wrote: “If the white citizens of the State of Georgia will wake

<sup>108</sup> Amended Complaint, *Georgia Coalition for the Peoples’ Agenda v. Kemp*, 1:18-cv-04727-ELR (N.D. Ga. Oct. 19, 2018), Dkt 15, at para. 70.

<sup>109</sup> *Id.*

<sup>110</sup> *Id.* Georgia did repeal this law in 2019, and pass a new match law, HB 316, which registered applicants flagged for minor discrepancies to vote, and required that they produce proof of identity to a poll official before voting. Campaign Legal Center. “Georgia Moves to Abandon Problematic Exact Match Policy,” April 5, 2019. <https://campaignlegal.org/update/georgia-moves-abandon-problematic-exact-match-policy>.

<sup>111</sup> HB 316.

<sup>112</sup> See generally, *Fair Fight Action v. Raffensperger*, 1:18-CV-05391-SCJ (N.D. Ga.); *Georgia Coal. for People’s Agenda, Inc. v. Kemp*, 347 F. Supp. 3d 1251, 1263 (N.D. Ga. 2018). The state continues to verify voters using old DDS information though it has relaxed its insistence that every dash or typo not included on both a voter’s identification and the state’s voting roll be a justification for denying voters the right to cast ballots. See Stanley Augustin, Georgia Largely Abandons Its Broken ‘Exact Match’ “Voter Registration Process,” Lawyers’ Committee for Civil Rights Under law (Apr. 5, 2019), <https://www.lawyerscommittee.org/georgia-largely-abandons-its-broken-exact-match-voter-registration-process/>.

<sup>113</sup> Order, *Fair Fight Action v. Raffensperger*, 1:18-CV-05391-SCJ (N.D. Ga.), ECF No. 636 at 15-16.

<sup>114</sup> Reis Thebault and Hannah Knowles. “Georgia Purged 309,000 Voters from Its Rolls. It’s the Second State to Make Cuts in Less Than a Week.” *Washington Post*, December 17, 2019. <https://www.washingtonpost.com/nation/2019/12/17/georgia-purged-voters-its-rolls-its-second-state-make-cuts-less-than-week/>.

<sup>115</sup> *Id.*

<sup>116</sup> Judd, Alan. “Georgia’s Strict Laws Lead to Large Purge of Voters.” *The Atlanta Journal-Constitution*, October 27, 2018, sec. Digging Deep. <https://www.ajc.com/news/state--regional-govt--politics/voter-purge-begs-question-what-the-matter-with-georgia/YAFvuk3Bu95kJIMaDiDFqJ/>.

<sup>117</sup> *Id.*; see also Caputo, Angela, Geoff Hing, and Johnny Kauffman. “How a Massive Voter Purge in Georgia Affected the 2018 Election.” *APM Reports*, October 29, 2019. <https://www.apmreports.org/story/2019/10/29/georgia-voting-registration-records-removed>.

up, they can disqualify and mark off the voters' list three-fourths of the Negro vote in this state."<sup>118</sup> He urged supporters to challenge whether Black voters were properly qualified, and mailed thousands of mimeographed challenge forms to supporters, which lead to massive purges of Black voters across the state.<sup>119</sup> Of Black voters who attempted to vote in primaries en masse in more than 30 counties, an estimated 15,000 to 25,000 had been purged from voting rolls.<sup>120</sup> "[T]he success of the Talmadge candidacy was achieved by policies curtailing black voting or by election irregularities."<sup>121</sup>

Part of the success of Talmadge's strategy of challenging Black voters was based on the ability of challengers to use voter race data. In 1894 the legislature adopted a law which required the racial designation of voters.<sup>107</sup> As part of the 1908 "Disfranchisement Act," Georgia required voter registration lists to show the race of all voters.<sup>108</sup>

As another example, in 1955 a United States District Court judge found that Black citizens in Randolph County had been unlawfully purged in 1954. Despite their eventual victory, the purges were successful in preventing hundreds of Black voters from participating in the September 1954 Democratic primary and the November general election, despite the plaintiffs' prayer for a preliminary injunction.<sup>122</sup> On July 15, 1954, the Board of Registrars issued notices to 525 Black registered voters requiring them to show cause why their names should not be stricken from the list of voters on July 21.<sup>123</sup> When the Black registered voters appeared, they were given a test, after which, 175 of 225 were deemed to be "unqualified as a voter."<sup>124</sup>

Echoes of these past practices can be heard in the 2016 decision of the majority white Hancock County Board of Elections and Registration to systematically challenge the legality of 187 voters, nearly all Black. The Board removed 53 of these voters; virtually all of those removed were Black.<sup>125</sup> The basis for the challenges included "unsubstantiated 'third party' allegations about individual residents."<sup>126</sup> The "county sheriff's deputies served summonses on the targeted voters, commanding them to defend themselves at election board meetings."<sup>127</sup> After being sued,

<sup>118</sup> Bernd, Joseph L. "White Supremacy and the Disfranchisement of Blacks in Georgia, 1946." *The Georgia Historical Quarterly* 66, no. 4 (1982): 494.

<sup>119</sup> *Id.*

<sup>120</sup> Key, Valdimer Orlando. *Southern Politics in State and Nation*. Knoxville: University of Tennessee Press, 1984, 570.

<sup>121</sup> Bernd, "White Supremacy and the Disfranchisement of Blacks in Georgia, 1946," 500.

<sup>122</sup> *Thornton v. Martin*, Civ. No. 520, 1 Race Rel. L. Rep. 213 (M.D. Ga. Nov. 23, 1956).

<sup>123</sup> *Id.* at 214.

<sup>124</sup> *Id.* at 214.

<sup>125</sup> Wines, Michael. "Critics See Efforts by Counties and Towns to Purge Minority Voters From Rolls." *The New York Times*, July 31, 2016, sec. U.S. <https://www.nytimes.com/2016/08/01/us/critics-see-efforts-to-purge-minorities-from-voter-rolls-in-new-elections-rules.html>.

<sup>126</sup> Torres, Kristina. "Groups Settle Ga. Suit Alleging Black Voters Wrongfully Disqualified." *The Atlanta Journal-Constitution*, March 8, 2017. <https://www.ajc.com/news/state--regional-govt--politics/groups-settle-suit-alleging-black-voters-wrongfully-disqualified/XzqFVMtXGH226dnDxkUbjJ/>.

<sup>127</sup> Wines, Michael. "Critics See Efforts by Counties and Towns to Purge Minority Voters From Rolls." *The New York Times*, July 31, 2016, sec. U.S. <https://www.nytimes.com/2016/08/01/us/critics-see-efforts-to-purge-minorities-from-voter-rolls-in-new-elections-rules.html>.

the county restored the purged voters and agreed not to remove voters based on third-party challenges or allegations of a change of address.<sup>128</sup>

### 3) Time/Place Restrictions

Manipulation of the time and location of registration and voting has been historically used by Georgia to limit Black participation.

To provide two examples of such impediments: First, a 1873 law allowed local election supervisors to “close their registration rolls to new applicants except during those times when Black farmers were too busy to register, such as planting or harvest time.”<sup>129</sup> In addition, polling places were placed in inconvenient locations for Blacks and maintained limited hours.<sup>130</sup> Second, in 1960, a district court found that the Registrar of Terrell County, “[d]elay[ed] action upon applications for registration by Negroes while not delaying such action with respect to applications by whites,” thus preventing Black people from becoming registered.<sup>131</sup> As a result of this, and other barriers, in 1960, there were approximately 3,000 registered white voters and only 53 registered Black voters.<sup>132</sup> The county was approximately 64 percent Black.<sup>133</sup>

In today’s Georgia, the time and location of registration and voting continue to affect the ability of Black voters to participate. Between 2012 and 2018, the state closed 214 voter precincts, decreasing the number of precincts in many minority majority neighborhoods.<sup>134</sup> In 5 of the counties where polls were closed after *Shelby*,<sup>135</sup> the Black turnout was under 50% in the 2020 election.<sup>136</sup> In 2008 turnout was 65.33% in Bacon, 75.91% in Habersham, 77.50% in Lowndes, 61.36% in Lumpkin, and 67.69% in Franklin County.<sup>137</sup> These precinct closures and the voter purges would have been subject to preclearance before *Shelby v. Holder*.<sup>138</sup>

<sup>128</sup> Torres, “Groups Settle Ga. Suit”; “An Assessment of Minority Voting Rights Access in the United States | U.S. Commission on Civil Rights.” U.S. Commission on Civil Rights, September 12, 2018. 139. <https://www.usccr.gov/reports/2018/assessment-minority-voting-rights-access-united-states>.

<sup>129</sup> Zelden, Charles L. *Voting Rights on Trial: A Handbook with Cases, Laws, and Documents*. Santa Barbara: ABC-CLIO, 2002, 75.

<sup>130</sup> *Id.* at 74.

<sup>131</sup> *United States v. Raines*, 189 F. Supp. 121, 126 (M.D. Ga. 1960)

<sup>132</sup> *Raines*, 189 F. Supp. at 125.

<sup>133</sup> McDonald, *Odyssey*, 46.

<sup>134</sup> Patrik Jonsson. “Voting After Shelby: How a 2013 Supreme Court Ruling Shaped the 2018 Election.” *Christian Science Monitor*, November 21, 2018. <https://www.csmonitor.com/USA/Justice/2018/1121/Voting-after-Shelby-How-a-2013-Supreme-Court-ruling-shaped-the-2018-election>; “Democracy Diverted: Polling Place Closures and the Right to Vote.” Washington, D.C.: The Leadership Conference on Civil and Human Rights, September 2019. 32. <https://civilrights.org/democracy-diverted/>.

<sup>135</sup> Niesse, Mark, and Maya T. Prabhu. “Voting Locations Closed across Georgia after Supreme Court Ruling.” *The Atlanta Journal-Constitution*, April 31, 2018. <https://www.ajc.com/news/state--regional-govt--politics/voting-precincts-closed-across-georgia-since-election-oversight-lifted/bBkHxptlim0Gp9pKu7dfrN/>.

<sup>136</sup> Georgia Secretary of State. “Elections,” 2018. <https://sos.ga.gov/index.php/elections>.

<sup>137</sup> Georgia Secretary of State. “Elections,” 2018. <https://sos.ga.gov/index.php/elections>.

<sup>138</sup> Allie Gottlieb, *The Struggle for Voting Rights in Georgia*, *Regulatory Review* (Jan. 4, 2021), <https://www.theregreview.org/2021/01/04/gottlieb-struggle-voting-rights-georgia/>

One impact of polling places is exacerbating the problem of closed long lines and wait times for voting, particularly in communities of color.<sup>139</sup> “In 2020 “about two-thirds of the polling places that had to stay open late for the June primary to accommodate waiting voters were in majority-Black neighborhoods, even though they made up only about one-third of the state’s polling places.”<sup>140</sup> “[T] the average wait time after 7 p.m. across Georgia was 51 minutes in polling places that were 90% or more nonwhite, but only 6 minutes in polling places that were 90% white.”<sup>141</sup>

Changing the timing of an election, such as from November to July can reduce voter turnout. The August-Richmond County government did just that in early 2014,<sup>142</sup> after the same change, which would require a change in state law, had been previously been objected to by the DOJ.<sup>143</sup> In objecting to the proposed change in 2012, the DOJ wrote:

An overall review of voter registration and turnout data indicates that voter turnout is substantially lower in July than November for both black and white voters. The drop in the participation rate for black voters, however, is significantly greater than that for white voters.

For example, in 2012, 74.5 percent of the black persons registered to vote in Augusta-Richmond cast a ballot in the November election; in the July election, their turnout rate was 33.2 percent. By comparison, the turnout rates for white registered voters were 72.6 percent for the November election, and 42.5 percent for the July election. This means that in percentage terms, black persons were 55.4 percent less likely to vote in July than in November, while white persons were only 41.4 percent less likely to vote.<sup>144</sup>

A similar proposal had been objected to by the DOJ in 1988.<sup>145</sup>

#### **4) Failure to Provide Voter Registration Opportunities at Public Assistance Offices**

There are numerous other ways in which Georgia’s actions in recent history continue to impose barriers to vote for Black voters. In 2011, for example, Georgia was sued by the Georgia NAACP and others for failing to offer voter registration services through its the public assistance offices as required under the National Voter Registration Act. The average percentage of Black

<sup>139</sup> Fowler, “Why Do Nonwhite Georgia Voters Have to Wait in Line for Hours?”; U.S. Commission on Civil Rights, “An Assessment of Minority Voting Rights Access in the United States,” 159.

<sup>140</sup> *Id.*

<sup>141</sup> *Id.*

<sup>142</sup> Baumgarten, Harry. “Shelby County v. Holder’s Biggest and Most Harmful Impact May Be on Our Nation’s Smallest Towns.” Campaign Legal Center, June 20, 2016. <https://campaignlegal.org/update/shelby-county-v-holders-biggest-and-most-harmful-impact-may-be-our-nations-smallest-towns>.

<sup>143</sup> Letter from Thomas E. Perez, U.S. Assistant Attorney General to Dennis R. Dunn, Ga. Deputy Attorney General (Dec. 21, 2015).

<sup>144</sup> *Id.*

<sup>145</sup> *Id.*



households in poverty for all counties in Georgia in 2010 was approximately 26.4% versus 11.5% for whites.<sup>146</sup> Total unemployment in 2010 was approximately 10%.<sup>147</sup> Black unemployment was higher than that of whites, 11.6% versus 8-9%. Black people have received public assistance at disproportionate rates. For example, in 2008-2009, 82.1% of TANF recipients in Georgia were Black compared to 15.3% who were white.<sup>148</sup>

The effects of Georgia's decision were clear: between 1995-1996, 103,942 Georgians registered to vote at public assistance offices.<sup>149</sup> In contrast, in 2008-2010, Georgia reported a huge decline in the number of voter registration forms through public assistance offices—either 279 total registrations or 13,443 registrations depending on which part of Georgia's inconsistent reporting one considers.<sup>150</sup>

An investigation conducted by the plaintiffs in that 2011 lawsuit found that “[n]one of the [public assistance] offices visited by the investigators in September 2010 included a voter registration form with the benefits application, and eight of the eleven offices could not even provide a voter registration application upon request.”<sup>151</sup>

“The September 2010 survey results also showed, ‘[A]mong the [public assistance] clients interviewed after completing NVRA-covered transactions ..., 44 of 50 reported that they were not offered voter registration; almost none of the 50 had been provided a voter preference form; and none of the 23 [public assistance] clients who had met with a caseworker during their visit to the [public assistance] office had been offered the opportunity to register to vote by the caseworker.’”<sup>152</sup>

Georgia moved to dismiss, arguing that it was not required to provide “voter registration applications to public assistance clients unless those clients appear in person,” meaning it did not

<sup>146</sup> The Kaiser Family Foundation, “Poverty Rate by Race/Ethnicity,” October 23, 2020, <https://www.kff.org/other/state-indicator/poverty-rate-by-raceethnicity/>.

<sup>147</sup> “Georgia Unemployment Up to 10.1%,” *Atlanta Business Chronicle*, December 16, 2010, <https://www.bizjournals.com/atlanta/news/2010/12/16/georgia-unemployment-up-to-101.html>.

<sup>148</sup> “Characteristics and Financial Circumstances of TANF Recipients, Fiscal Year 2009: Table 21: TANF - Active Cases, Percent Distribution of TANF Adult Recipients by Ethnicity/Race, October 2008 - September 2009.” U.S. Department of Health and Human Services: Office of Family Assistance, August 24, 2010, <https://www.acf.hhs.gov/ofa/data/characteristics-and-financial-circumstances-tanf-recipients-fiscal-year-2009-57>.

<sup>149</sup> “Implementing the National Voter Registration Act: A Report to State and Local Election Officials on Problems and Solutions Discovered 1995 -1996.” Washington, D.C.: The Office of Election Administration: Federal Election Commission, March 1998, 127 Appendix C, Table 2. [https://www.eac.gov/sites/default/files/eac\\_assets/1/28/Implementing%20the%20NVRA--Report%20to%20State%20and%20Local%20Election%20Of.pdf](https://www.eac.gov/sites/default/files/eac_assets/1/28/Implementing%20the%20NVRA--Report%20to%20State%20and%20Local%20Election%20Of.pdf).

<sup>150</sup> “The Impact of the National Voter Registration Act of 1993 on the Administration of Elections for Federal Office 2009-2010: A Report to the 112th Congress.” Washington, D.C.: U.S. Election Assistance Commission, June 30, 2011, 39 Appendix B, Table 2a. [https://www.eac.gov/sites/default/files/eac\\_assets/1/28/2010%20NVRA%20FINAL%20REPORT.pdf](https://www.eac.gov/sites/default/files/eac_assets/1/28/2010%20NVRA%20FINAL%20REPORT.pdf); *see also id.* at 44, Appendix B, Table 2b; 52, Appendix B, Table 2d.

<sup>151</sup> *Georgia State Conf. of N.A.A.C.P. v. Kemp*, 841 F. Supp. 2d 1320, 1325 (N.D. Ga. 2012) (quoting plaintiffs’ complaint).

<sup>152</sup> *Id.* (quoting complaint).

have to provide them by mail.<sup>153</sup> In denying the Defendants' motion to dismiss, the district court observed:

that while Georgia has chosen not to implement procedures for distributing voter registration application forms to public assistance clients applying remotely, its legislature has been proactive in implementing procedures to register voters through offices that do not provide public assistance. Specifically, in 2004, Georgia passed O.C.G.A. § 21-2-221.1. 2004 Ga. Laws 732. Its operative provision provides, in relevant part, "Each application to obtain a resident hunting, fishing, or trapping license...shall also serve as an application for voter registration unless the applicant declines to register to vote through specific declination or by failing to sign the voter registration application." O.C.G.A. § 21-2-221.1. The court declines to speculate on the motives behind Georgia's choice to automatically convert applications for those wishing to hunt or fish in Georgia into voter registration applications and then fight the proposition that Georgia is required to merely offer voter registration applications to applicants for public assistance. The court will offer an observation, however: the NVRA expresses a policy of increasing the number of eligible citizens who register to vote and implements that policy by reaching a wide range of citizens through offices they are likely to contact, especially after a change of address. Georgia, however, seems to favor a less inclusive group of eligible citizens for voter registration.<sup>154</sup>

Following the court's decision, Georgia settled the case and agreed to change its policies and practices to make voter registration more widely available through its public assistance offices, to provide training, to designate coordinators responsible for ensuring compliance with the National Voter Registration Act in public assistance offices, and to undergo monitoring of the settlement agreement.<sup>155</sup>

### **5) Backlash to Record Black Voter Turnout in the 2020 Election**

During the 2020 election Black voters were able to overcome tactics<sup>156</sup> to minimize minority access in prior years and accessed the polls in record numbers. The state expanded in particular absentee vote by mail as part of an effort to ensure that voters had access to the polls despite the global Coronavirus pandemic. Absentee ballot applications were mailed to every active, registered voter for the primary elections,<sup>157</sup> and third-party groups were allowed to provide

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<sup>153</sup> *Id.* at 1328.

<sup>154</sup> *Id.* at 1332.

<sup>155</sup> Settlement Agreement, Georgia State Conf. of N.A.A.C.P. v. Kemp, No. 1:11-cv-01849 (N.D. Ga. April 8, 2012), ECF No. 55, Exhibit A.

<sup>156</sup> Fowler, Stephen. "Why Do Nonwhite Georgia Voters Have to Wait in Line for Hours? Their Numbers Have Soared, and Their Polling Places Have Dwindled." *ProPublica*, October 17, 2020. [https://www.propublica.org/article/why-do-nonwhite-georgia-voters-have-to-wait-in-line-for-hours-their-numbers-have-soared-and-their-polling-places-have-dwindled?token=\\_Q2PjoPDva608iMRGpDGHnrBxVfvt7EH](https://www.propublica.org/article/why-do-nonwhite-georgia-voters-have-to-wait-in-line-for-hours-their-numbers-have-soared-and-their-polling-places-have-dwindled?token=_Q2PjoPDva608iMRGpDGHnrBxVfvt7EH).

<sup>157</sup> Emil Moffat. "Georgia Sent Out Nearly 7 Million Absentee Ballot Applications For Primary, But Proposed Bill Won't Let It Happen Again." *WABE*, June 24, 2020. <https://www.wabe.org/georgia-sent-out-nearly-7-million-absentee-ballot-applications-for-primary-but-proposed-bill-wont-let-it-happen-again/>.

absentee ballot applications to voters by request.<sup>158</sup> Drop boxes were plentiful, especially in metropolitan Atlanta, and located outside of polling locations to allow voters to drop absentee ballots 24-7.<sup>159</sup>

Turnout was unprecedented in the November 2020 election,<sup>160</sup> arguably fueled by some degree by the increased access but also by the mobilization of voters and the high-profile nature of the elections.<sup>161</sup>

In between the presidential election and the Senate runoff election, the state Senate Republican Caucus announced that they would push for the changes to the procedures that had increased voting access—including ending absentee voting without cause and banning ballot drop boxes—during the next legislative session.<sup>162</sup> And when the state legislature convened for the regular legislative session, shortly after the Senate runoff election, the sole issue during the session appeared to be preparing proposals to change Georgia voting laws. The new voting laws at issue were measures that would give authority to the state legislature to take over county election boards, restrict absentee mail-in voting, and disenfranchise voters who vote at the wrong precinct in addition to multiple additional measures. That would make voting more difficult for Georgians and radically change the voting regulations in the counties where Black Georgians voted. State legislators in support of the new measures argued that they would be designed to make voting more secure against fraud and accessible.<sup>163</sup>

During the legislative session, state legislators in the General Assembly rushed to draft and approve the legislation that became SB 202.<sup>164</sup> Hearings were often called outside business hours with limited notice to the public, and leaders in the Georgia State legislature made the final drafts of SB202 public only hours before the final vote.

Once the legislation was passed by both houses, it was taken *immediately* to Governor Kemp's office. Kemp signed the legislation in his office surrounded by six white state officials.<sup>165</sup> A Black state legislator who attempted to attend the closed signing, was turned away from the

<sup>158</sup> Niese, Mark. "Groups Mass Mail Absentee Ballot Applications to Georgia Voters." *The Atlanta Journal-Constitution*, August 25, 2020.

<sup>159</sup> Niese, Mark, Stephen Fowler, Sarah Kallis, and Isaiah Poritz. "Drop Box Use Heavy in Democratic Areas before Georgia Voting Law." *The Atlanta Journal-Constitution*, July 12, 2021, <https://www.ajc.com/politics/drop-box-use-soared-in-democratic-areas-before-georgia-voting-law/N4ZTGHLD5BRBOUKBHTUCFVOEU/>.

<sup>160</sup> Georgia Secretary of State. "General Election Turnout by Demographics November 2020." Accessed December 30, 2021. [https://sos.ga.gov/index.php/elections/general\\_election\\_turnout\\_by\\_demographics\\_november\\_2020](https://sos.ga.gov/index.php/elections/general_election_turnout_by_demographics_november_2020).

<sup>161</sup> Olivia B. Waxman. "Stacey Abrams and Other Georgia Organizers Are Part of a Long—But Often Overlooked—Tradition of Black Women Working for the Vote." *Time*, January 8, 2021. <https://time.com/5909556/stacey-abrams-history-black-women-voting/>.

<sup>162</sup> Ben Nadler, "Georgia Senate GOP push for end to no-excuse absentee voting," *AP*, December 8, 2020. <https://apnews.com/article/election-2020-joe-biden-donald-trump-legislature-georgia-db63d0d40fddd0724faffdfc8b72c0c>.

<sup>163</sup> "Legislator Introduces Bill to Eliminate Ballot Drop Boxes in Georgia." FOX 5 Atlanta, December 13, 2021. <https://www.fox5atlanta.com/news/georgia-legislator-introduces-bill-to-eliminate-ballot-drop-boxes>

<sup>164</sup> NAACP Legal Defense and Educational Fund. "Facts About LDF's Lawsuit Challenging Georgia's Voter Suppression Law." Accessed December 30, 2021. <https://www.naacpldf.org/naacp-publications/ldf-blog/important-facts-about-ldfs-lawsuit-challenging-georgias-voter-suppression-bill/>.

<sup>165</sup> John Blake. "These Two Photos Show Who Georgia's New Elections Law Benefits – and Hurts." CNN, March 26, 2021. <https://www.cnn.com/2021/03/26/politics/georgia-voting-law-two-photos/index.html>.

governor's suite, and arrested.<sup>166</sup> Black civil and voting rights organizations such as the National Urban League, the National Action Network and National Coalition on Black Civic Participation decried the bill as "pure voter suppression."<sup>167</sup>

SB202 placed a number of limitations on voter access, arguably designed to disproportionately impact Black, minority, poor and youth voters.<sup>168</sup> The law requires voters seeking absentee ballots to provide personal identifying information, shortens the duration for applying for ballot, and shortens the period in which to return applications.<sup>169</sup> Such restrictive requirements on absentee voting will disproportionately impact Black voters who used absentee voting in greater numbers, an increase from 23 to 31% in 2020 versus previous elections.<sup>170</sup> In November 2020, 29.27 percent of Black voters cast an absentee ballot, compared to 23.88 percent of white voters, while in the January 2021 general election runoff, 27.65 percent of Black voters cast an absentee ballot, compared to 21.72 percent of white voters.<sup>171</sup>

SB 202 also significantly restricts access to drop boxes, placing severe caps on the total number of drop boxes and requiring precincts to maintain the boxes only inside, subject to more limited hours that polls are open during Early Voting hours. For example, in 2020 there were 94 drop boxes for the six million residents of metro Atlanta. Yet, after SB 202, there will only be 23 boxes available, none of which will be accessible outside Early Voting locations or outside Early Voting hours.<sup>172</sup>

## **II. Both Explicit and Subtle Racial Appeals Continue to Play a Central Role in Political Campaigns in Georgia (Factor 6).**

Racial resentment and fear have also often been incorporated into political campaign strategies in the State of Georgia. For instance, prior to 1966, every Georgia Governor ran on a platform that included blatantly racist, anti-Black appeals.<sup>173</sup> Modern political campaigns in Georgia continue to heavily feature both explicit racial appeals and subtle racial appeals in the form of dog-whistle politics.

<sup>166</sup> Diaz, Jaclyn. "Georgia Lawmaker Arrested As Governor Signs Law Overhauling Elections." *NPR*, March 26, 2021, sec. Politics. <https://www.npr.org/2021/03/26/981471672/police-arrest-georgia-lawmaker-as-governor-signs-law-overhauling-elections>.

<sup>167</sup> National Action Network. "Civil Rights Leaders Denounce Passage of Georgia Senate Bill 202 as 'Pure Voter Suppression,'" News Release, March 27, 2021. <https://nationalactionnetwork.net/newnews/civil-rights-leaders-denounce-passage-of-georgia-senate-bill-202-as-pure-voter-suppression/>.

<sup>168</sup> Fowler, Stephen. "What Does Georgia's New Voting Law SB 2020 Do?," *GPB NEWS*, Mar. 27, 2021. <https://www.gpb.org/news/2021/03/27/what-does-georgias-new-voting-law-sb-202-do> (listing some examples of how SB202 affects voters in Georgia).

<sup>169</sup> *Id.*

<sup>170</sup> Kevin Morris, Georgia's Proposed Voting Restrictions Will Harm Black Voters Most, March 6, 2021, <https://www.brennancenter.org/our-work/research-reports/georgias-proposed-voting-restrictions-will-harm-black-voters-most>. Black use of absentee ballots increased from 23 to 31%.

<sup>171</sup> Complaint, *United States v. Georgia*, 1:21-cv-02575 (June 25, 2021), ECF No. 1, at para. 22.

<sup>172</sup> Thompson, Derek. "The Truth About Georgia's Voter Law." *The Atlantic*, April 8, 2021. <https://www.theatlantic.com/ideas/archive/2021/04/georgia-voting-rights-fiasco/618537/>.

<sup>173</sup> McDonald, *Odyssey*, 85. ("Every modern Georgia governor, through the election of Lester Maddox in 1966, was in fact a vocal supporter of the Jim Crow system.").

Dog-whistle politics refers to racist appeals that are made implicitly instead of explicitly, using coded speech and visual imagery designed to invoke racial animus.<sup>174</sup> Negative stereotypes and beliefs about Black people are a standard part of American and Georgia state history that continue to pervade the culture.<sup>175</sup> Dog whistling in campaign advertisement is an effective method of mobilizing white racial resentment while adhering to norms of racial equity.<sup>176</sup> Lee Atwater, the premiere dogwhistler in the 1980s and 1990s, described the development of the strategy as follows:

You start out in 1954 by saying, “Nigger, nigger, nigger.” By 1968 you can’t say “nigger”—that hurts you, backfires. So you say stuff like, uh, forced busing, states’ rights, and all that stuff, and you’re getting so abstract. Now, you’re talking about cutting taxes, and all these things you’re talking about are totally economic things and a byproduct of them is, blacks get hurt worse than whites.... “We want to cut this,” is much more abstract than even the busing thing, uh, and a hell of a lot more abstract than “Nigger, nigger.”<sup>177</sup>

Atwater also helped facilitate the quintessential example of the use of dog whistle campaigning: the 1984 Willie Horton advertisement sponsored by the George H. W. Bush campaign. The ad, as described by Bill Keller, editor-in-chief of The Marshall Project, “features a portrait of this very scary looking, disheveled, wild-eyed,” incarcerated black man who raped and killed innocent citizens while on furlough in Massachusetts. Atwater explained “by the end of this campaign, you’re going to think that Willie Horton is Michael Dukakis’ running mate.”<sup>178</sup> The advertisement did not explicitly mention race, but used imagery and coded speech to play on white fear, not just of crime, but of black crime.<sup>179</sup>

One example of an explicit virulent racial appeal is a 2018 robo-call’s labeling of describing Governor candidate Stacey Abrams as the “Negress Stacey Abrams” and “a poor man’s Aunt Jemima.”<sup>180</sup> The 2018 Georgia gubernatorial context also featured racial appeals by dog whistle: after a photo surfaced of some members of the New Black Panther Party marching in support of

<sup>174</sup> Perlstein, Rick. “Exclusive: Lee Atwater’s Infamous 1981 Interview on the Southern Strategy,” November 13, 2012. <https://www.thenation.com/article/archive/exclusive-lee-atwaters-infamous-1981-interview-southern-strategy/>.

<sup>175</sup> Ibram X. Kendi. *Stamped from the Beginning: The Definitive History of Racist Ideas in America*. New York: Nation Books, 2016.

<sup>176</sup> Ian Haney López. “Third Rail Series Lecture: UC Berkeley, ‘Dog Whistle Politics: Coded Racism and Inequality for All.’” Center for the Study of Race and Ethnicity in America, Brown University, April 2, 2015. [https://www.brown.edu/academics/race-ethnicity/events/third-rail-series-lecture-ian-haney-l%C3%B3pez-uc-berkeley-dog-whistle-politics-coded-racism-and-;Haney López, Ian. \*Dog Whistle Politics: How Coded Racial Appeals Have Reinvented Racism and Wrecked the Middle Class\*. Oxford University Press, 2015.](https://www.brown.edu/academics/race-ethnicity/events/third-rail-series-lecture-ian-haney-l%C3%B3pez-uc-berkeley-dog-whistle-politics-coded-racism-and-;Haney%20L%C3%B3pez,Ian.Dog%20Whistle%20Politics%20How%20Coded%20Racial%20Appeals%20Have%20Reinvented%20Racism%20and%20Wrecked%20the%20Middle%20Class.Oxford%20University%20Press,2015)

<sup>177</sup> Perlstein, “Exclusive: Lee Atwater’s Infamous 1981 Interview on the Southern Strategy.”

<sup>178</sup> The Takeaway. “The Campaign Ad That Reshaped Criminal Justice,” May 18, 2015.

<https://www.wnycstudios.org/podcasts/takeaway/segments/crime-reshaped-criminal-justice>.

<sup>179</sup> Baker, Peter. “Bush Made Willie Horton an Issue in 1988, and the Racial Scars Are Still Fresh.” *The New York Times*, December 4, 2018, <https://www.nytimes.com/2018/12/03/us/politics/bush-willie-horton.html>.

<sup>180</sup> Cleve R. Wootson, Jr. “At Georgia Senate Debate, Warnock and Loeffler Argue over Coronavirus Relief, Police Funding.” *Washington Post*, December 6, 2020, <https://www.washingtonpost.com/politics/2020/12/06/georgia-senate-debate-live-updates/>.



Abrams—even though Abrams has never associated with the New Black Panther Party—Brian Kemp posted the photos on social media channels with the caption “How radical is my opponent? Just look at who is backing her campaign for governor,” and urging followers to “RT [re-tweet] if you think Abrams is TOO EXTREME for Georgia!”<sup>181</sup>

In the 2020 runoff campaign, Rev. Raphael Warnock, who was running to be the second Black senator elected in the South since the end of Reconstruction and Georgia’s first Black senator,<sup>182</sup> was the target of both overt and subtle, dog whistle, racial appeals. Warnock, who became the first Black Senator from a former Confederate state since Reconstruction, was “attacked more than any other candidate in paid TV commercials in the Georgia runoffs.”<sup>183</sup>

An example of an explicit racial appeal made by then-Sen. Kelly Loeffler, is one where she accused Warnock of being “too extreme” because he had defended president Barack Obama’s former pastor Jeremiah Wright, who she accused of being “divisive” and “hurtful” in “call[ing] on Americans to repent for their worship of Whiteness.”<sup>184</sup> A Loeffler campaign surrogate, U.S. Rep. Doug Collins, referred to Warnock, a Black man, as an “it,” saying—“There is no such thing as a pro-choice pastor. What you have is a lie from the bed of Hell. It is time to send it back to Ebenezer Baptist Church.”<sup>185</sup>

Warnock’s race was also invoked in a Facebook ad sponsored by Loeffler’s campaign, where Warnock’s skin color was artificially darkened. The Loeffler campaign used the same footage to create two ads, one with Warnock’s actual complexion. Both ads were run on Facebook, but 10 times as much money was spent to boost the version in which Warnock appeared darker.<sup>186</sup>

Another example of a racially charged advertisement sponsored by the Loeffler campaign featured “a classroom of mostly white children ... followed by grainy footage from what appears to be one of the summer’s many protests against police violence, with Warnock’s image laid on

<sup>181</sup> Glaser, April. “It Was Too Easy for Brian Kemp’s Last-Minute Dog Whistle About Stacey Abrams to Go Viral.” *Slate*, November 7, 2018. <https://slate.com/technology/2018/11/brian-kemp-stacey-abrams-dog-whistle-black-panthers-facebook.html>.

<sup>182</sup> Veronica Stracqualursi. “Warnock Will Make History as Georgia’s First Black Senator.” CNN, January 6, 2021. <https://www.cnn.com/2021/01/06/politics/warnock-georgia-first-black-senator/index.html>.

<sup>183</sup> Marc Caputo and Maya King. “Why Warnock Talks Puppies Instead of Race.” *Politico*, January 3, 2021. <https://www.politico.com/news/2021/01/03/raphael-warnock-georgia-race-453222>.

<sup>184</sup> Wootson, Jr. “At Georgia Senate Debate, Warnock and Loeffler Argue over Coronavirus Relief, Police Funding.”

<sup>185</sup> Galloway, Jim. “Opinion: The Kelly Loeffler, Raphael Warnock Runoff Crosses a Line.” *The Atlanta Journal-Constitution*, December 1, 2020. <https://www.ajc.com/politics/politics-blog/opinion-the-kelly-loeffler-raphael-warnock-runoff-crosses-a-line/Z7YGZ4MBOFFNJHKBBIJTN6SHJM/>.

<sup>186</sup> Sollenberger, Roger. “Kelly Loeffler’s New Facebook Ad Darkens Skin of Raphael Warnock, Her Black Opponent.” *Salon*, January 4, 2021. <https://www.salon.com/2021/01/04/kelly-loefflers-new-facebook-ad-darkens-skin-of-raphael-warnock-her-black-opponent/>; Manthan Chheda. “Kelly Loeffler Campaign Caught Darkening Skin of Opponent Raphael Warnock in Facebook Ad.” *International Business Times*, January 5, 2021, sec. Politics. <https://www.ibtimes.sg/kelly-loefflers-campaign-caught-darkening-skin-opponent-raphael-warnock-facebook-ad-54651> (same).

top.”<sup>187</sup> The ad ends by telling the viewer “saving the Senate is about saving American from that.”<sup>188</sup>

In a December 2020 debate, Loeffler repeated the moniker, “radical, liberal Raphael Warnock” thirteen times in a single debate, or almost once every two minutes.<sup>189</sup> This repeated name-calling echoed Loeffler’s television ads which claimed that Warnock “hosted a rally for Communist Dictator Fidel Castro,” “praised Marxism,” and would “give the radicals total control.”<sup>190</sup>

Associating Black candidates or candidates who seek to represent causes important to Black people, like civil rights, with Communism is a well-established trope. In 1957, the Georgia legislature passed a resolution calling for the “Impeachment of Certain U.S. Supreme Court Justices” for their “pro-communist and unconstitutional decisions” including *Brown v. Board of Education*, 347 U.S. 348 (1954), and accused the justices of “committ[ing] high crimes and misdemeanors and [giving] aid and comfort to the communist enemies of the United States.”<sup>191</sup> Lester Maddox, elected Governor of Georgia in 1966, “took out regular ads for his restaurant in Atlanta papers that excoriated, for example, ‘the ungodly Civil Rights legislation that the politicians and the Communists and the Communist-inspired agitators are trying to pass in congress that will enslave all Americans.’”<sup>192</sup> Thus, when a Black candidate is repeatedly and consciously tagged as a communist and/or Marxist, the appeal is not limited to, or even primarily about, a debate about economic policy. Instead, it is a code that taps into a history that labels those who advocate for issues important to Black people as “communists,” and communicates racial appeals without using the word “Black.”<sup>193</sup>

As another example from 2020, Marjorie Taylor Greene, who was running for Congress in Georgia’s 14th Congressional District, called the election of Reps. Rashida Tlaib and Ilhan Omar an “Islamic invasion” of the U.S. government, suggested that George Soros turned Jews over to Nazis, and described Black people as “slaves” to the Democratic Party.<sup>194</sup> This appeal was reminiscent of a social media message shared by the husband of congressional candidate and

<sup>187</sup> Day, Eli. “Kelly Loeffler’s Familiar Dog Whistle.” *The American Prospect*, December 10, 2020.

<https://prospect.org/api/content/c6fe9774-3b15-11eb-9b61-1244d5f7c7c6/>.

<sup>188</sup> Bluestein, Greg. “Loeffler’s Campaign Takes Aim at Warnock in First TV BroadSides.” *The Atlanta Journal-Constitution*, November 12, 2020. <https://www.ajc.com/politics/politics-blog/loefflers-campaign-takes-aim-at-warnock-in-first-tv-broadsides/ZAM5Y4NEQ5CCLALS7T6KKKN5YI/>.

<sup>189</sup> Matt Cannon. “Kelly Loeffler Said ‘Radical Liberal’ 13 Times during Georgia Runoff Debate with Raphael Warnock.” *Newsweek*, December 7, 2020. <https://www.newsweek.com/kelly-loeffler-radical-liberal-georgia-runoff-debate-raphael-warnock-1552759>.

<sup>190</sup> Gore, D’Angelo. “Loeffler-Warnock Runoff Starts with Attack Ads.” *FactCheck.Org*, November 19, 2020. <https://www.factcheck.org/2020/11/loeffler-warnock-runoff-starts-with-attack-ads/>, (explaining that Warnock was just a youth pastor for a Harlem-based church where Castro once gave a speech in 1995 and Warnock was uninvolved in the event).

<sup>191</sup> Ga. Laws 1957, pp. 553, 558-60.

<sup>192</sup> Rick Perlstein. *Nixonland: The Rise of a President and the Fracturing of America*. Simon and Schuster, 2008, 131.

<sup>193</sup> Haney López, “Third Rail Series Lecture: UC Berkeley”

<sup>194</sup> Mutnick, Ally. “New GOP Headache as Candidate Condemned for Racist Videos Wins Republican Primary.” *Politico*, August 11, 2020. <https://www.politico.com/news/2020/08/11/house-candidate-condemned-for-racist-videos-wins-republican-primary-394008>.

former Georgia Secretary of State Karen Handel who encouraged votes for his wife to “free the black slaves from the Democratic plantation.”<sup>195</sup>

Another recent example of a dog whistle campaign involves mailers distributed to residents of Sandy Springs and Johns Creek, where several people of color were running for mayor and City Council seats. The mailers said: “We can’t let Sandy Springs [or Johns Creek, in that city’s case] turn into Atlanta.” The flyer included side-by-side photos of a rundown apartment building and a protest.<sup>196</sup> Another flier in support of non-Black candidates read: “...Save Johns Creek from the partisan group targeting Johns Creek to radically change our quality of life.”<sup>197</sup>

The messaging that Black candidates are unsavory, unqualified and incompetent because they are Black is a persistent racial appeal waged in Georgia political campaigns. In 2016, Tom Worthan, a longtime Douglas County Commissioner facing a Black female opponent, said that governments run by Black officials “bankrupt you,” and that if an African-American sheriff candidate were elected, he was “afraid he’d put a bunch of blacks in leadership positions” that “they’re not qualified to be in.”<sup>198</sup> To explain his comments, Worthan said: “I spoke as a politician, trying to say what I needed to say to get a vote.”<sup>199</sup>

These examples show that racial appeals—both explicit and subtle—continue to play an important role in political campaigns in Georgia.

### **III. Black Georgians Have Historically Been Underrepresented in Public Office and That Underrepresentation Persists Today, Particularly in Areas that are the Focus of the Lawsuit (Factor 7).**

Senate Factor 7 is the “extent to which members of the minority group have been elected to public office in the jurisdiction,” the state of Georgia.

Black Georgians have been and continue to be underrepresented in public office. Despite persistently making up a significant portion of the state population, Black Georgians have faced barriers to being elected to public office, both historically and contemporarily. There are, moreover, areas in the state, including areas at issue in this lawsuit, that have not elected any Black officials to the Georgia Assembly in at least the last fifteen years.

<sup>195</sup> Sophia Tesfaye. “Karen Handel’s Husband Shares Meme Urging Voters to ‘Free the Black Slaves from the Democratic Plantation.’” *Salon*, May 3, 2017. <https://www.salon.com/2017/05/03/karen-handels-husband-shares-meme-urging-voters-to-free-the-black-slaves-from-the-democratic-plantation/>.

<sup>196</sup> Dixon, Kristal. “Candidates Drag Atlanta Crime into Suburban Elections.” *Axios*, October 28, 2021. <https://www.axios.com/local/atlanta/2021/10/28/candidates-drag-atlanta-crime-into-suburban-elections>.

<sup>197</sup> Murchison, Adrienne. “Crime Fears Emerge in Johns Creek, Sandy Springs Municipal Elections.” *The Atlanta Journal-Constitution*, October 26, 2021. <https://www.ajc.com/neighborhoods/north-fulton/crime-fears-emerge-in-johns-creek-sandy-springs-municipal-elections/HAMJ4MEMVVA3BCYC36ZOGR3OKM/>.

<sup>198</sup> Ernie Suggs, “Douglas Leader’s Racial Comments Spark Calls That He Resign,” *Atlanta Journal-Constitution*, September 30, 2016. <https://www.ajc.com/news/local/douglas-leader-racial-comments-spark-calls-that-resign/AVjoe8BDCXLsut6OBpjIHI/>.

<sup>199</sup> *Id.*

The state has sent very few Black elected officials to the U.S. Congress. During the state's history, spanning over 200 years, there have only been twelve Black members of Congress elected from the state of Georgia (11 to the House of Representatives, 1 to the U.S. Senate). Until 1972, there had only been one Black candidate elected to the U.S. Congress from Georgia, Jefferson Franklin Long. His tenure was short, spanning just three months in 1871. Since 1965, out of the 365 total seats in the U.S. Congress allocated to Georgia, only 12, or 3.28%, have been occupied by Black officials. Raphael Warnock is the first Black person to represent Georgia in the U.S. Senate. Warnock was elected in 2020, a year when voting access was substantially expanded to make voting accessible despite the COVID pandemic.

At the state level, only two Black people have been elected to non-judicial statewide office in Georgia's entire 233 years: Labor Commissioner Mike Thurmond in 2002 and 2006 and former Attorney General Thurbert Baker in 1998, 2002, and 2006.<sup>200</sup> Georgia has never had a Black Governor<sup>201</sup> or Lieutenant Governor.<sup>202</sup>

Judge Robert Benham of the Georgia Court of Appeals was the first Black person ever elected to a statewide office in Georgia in 1984, but as is the case with the election of almost all appellate judges in Georgia, he had been first appointed to the position by the Governor, before running for, and winning election, to retain his seat.<sup>203</sup> While statewide judge positions in Georgia are formally selected by non-partisan election,<sup>204</sup> in practice the overwhelming majority of positions are filled by people who were appointed to an interim vacancy on the bench. Between 1964-2004, that was true for 91% of Georgia state supreme court justices.<sup>205</sup>

In the state capitol, as of 2021, there are 16 Black State Senators in Georgia out of 56 State Senate districts, meaning Black Senators make up 28.57% of the State Senate.<sup>206</sup> In the Georgia State House, there are 52 Black State Representatives out of 180 districts, meaning Black

<sup>200</sup> Order, *Fair Fight Action, Inc. v. Raffensperger*, 18-cv-05391-SCJ (N.D. Ga. Nov. 15, 2021), ECF No. at 636. See also Euell A. Nielsen, "Thurbert Earl Baker," BlackPast.org, September 26, 2020.

<https://www.blackpast.org/african-american-history/thurbert-earl-baker-1952/>. History, Office of the Att'y Gen., <https://law.georgia.gov/about-us/history> (last visited Jan. 4, 2022).

<sup>201</sup> See Asma Khalid, "50 States And No Black Governors, But That Could Change In 2018," *NPR*, May 18, 2018. <https://www.npr.org/2018/05/18/611783940/50-states-and-no-black-governors-but-that-could-change-in-2018>.

<sup>202</sup> See Yussuf Simmonds, "African American Lieutenant Governors," *Los Angeles Sentinel*, April 6, 2009, <https://lasentinel.net/african-american-lieutenant-governors.html>; Buchanan, Scott. "Lieutenant Governor." In *New Georgia Encyclopedia*, last modified Aug. 21, 2020. <https://www.georgiaencyclopedia.org/articles/counties-cities-neighborhoods/county-unit-system>.

<sup>203</sup> "Black Judge Wins Georgia Election," *New York Times*, August 16, 1984, <https://www.nytimes.com/1984/08/16/us/black-judge-wins-georgia-election.html>.

<sup>204</sup> Johnsen, Diane, Building a Bench: A Close Look at State Appellate Courts Constructed by the Respective Methods of Judicial Selection (October 3, 2016). 53 San Diego L. Rev. 829 (2016).

<sup>205</sup> Berry, Kate, and Cathleen Lisk. 2017. *Appointed and Advantaged: How Interim Vacancies Shape State Courts*. [https://www.brennancenter.org/sites/default/files/analysis/Appointed\\_and\\_Advantaged\\_How\\_Interim\\_Appointments\\_Shape\\_State\\_Courts.pdf](https://www.brennancenter.org/sites/default/files/analysis/Appointed_and_Advantaged_How_Interim_Appointments_Shape_State_Courts.pdf).

<sup>206</sup> Carl Smith. "Blacks in State Legislatures: A State-by-State Map." *Governing* (blog), January 13, 2021. <https://www.governing.com/nw/blacks-in-state-legislatures-a-state-by-state-map.html>; <https://www.legis.ga.gov/members/senate>.

Representatives make up 28.88% of the State House.<sup>207</sup> According to the 2020 census, Georgia is 33% Black.<sup>208</sup>

The 4.12% gap between the percentage of Black State Representatives and the Black population is significant. 4.12% of Georgia's population of 10,711,908 is 441,331 people, or the equivalent of more than 7 state house districts.<sup>209</sup> So, too, with the 4.43% gap between the percentage of Black Senators and the Black population. 4.43% of the population is 474,537 people, or the equivalent of several senate districts.<sup>210</sup>

Black candidates who are elected to the General Assembly in 2020, all were elected in districts where the percentage of registered voters who are white is under 54.9%, with the vast majority elected from districts where the percentage of registered voters who are white is under 40%.<sup>211</sup>

### House

	Race of winning candidate				
% of Registered voters who are white	White	Black	Asian	Latinx	Total
Under 40.0	7	48	3	2	60
40.0-46.2	3	3	0	0	6
46.3-54.9	17	1	0	0	18
55.0-62.4	28	0	0	0	28
Over 62.4	68	0	0	0	68
Total	123	52	3	2	180
	Race of Winning Candidate				
% of Registered voters who are white	White	Black	Asian	Latinx	Total
Under 50.0	16	51	3	2	72
Over 50.0	107	1	0	0	108
Total	123	52	3	2	180

### Senate

	Race of Winning Candidate				
% of Registered voters who are white	White	Black	Asian	Latinx	Total
Under 47.0	1	16	2	0	19
47.0-54.9	6	0	0	0	6
55.0 and above	31	0	0	0	31

<sup>207</sup> Carl Smith. "Blacks in State Legislatures: A State-by-State Map." *Governing* (blog), January 13, 2021. <https://www.governing.com/now/blacks-in-state-legislatures-a-state-by-state-map.html>;

<https://www.legis.ga.gov/members/house>.

<sup>208</sup> U.S. Census Bureau. "Georgia Among Top Five Population Gainers Last Decade." Census.gov. Accessed January 1, 2022. <https://www.census.gov/library/stories/state-by-state/georgia-population-change-between-census-decade.html>.

<sup>209</sup> EX B. at 5 (identifying population range for 2021 House districts as 58,678 to 60,308).

<sup>210</sup> Ex. A at 5 (identifying population range for 2021 Senate districts as 189,320 to 193,163).

<sup>211</sup> Greenbaum, John, Jason Enos, and Divya Korada. "The Central Role of Racial Demographics in Georgia Elections." Lawyers' Committee for Civil Rights Under Law, May 2021. [https://lawyerscommittee.org/wp-content/uploads/2021/05/Final\\_Georgia-Redistricting-Report-1-1.pdf](https://lawyerscommittee.org/wp-content/uploads/2021/05/Final_Georgia-Redistricting-Report-1-1.pdf).



Total	38	16	1	0	56
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The state parties too, historically and today, are divided by race. Since 1908, when the last Black person to be elected as part of the Reconstruction era left office, the Republican Party has only elected two Black people to the Georgia Assembly.<sup>212</sup> And up until 1963, the Democratic Party had never elected a Black member to the Georgia Assembly.<sup>213</sup> Since 2000, 59% of Democratic Party elected officials are Black. A mere 0.5% of Republican Party elected officials have been Black. The 2020 election shows this racial division in parties continues for state legislative races: Of the 138 seats that the Republicans secured, 0 were won by Black legislators; of the 99 the Democratic party secured, 68 of them went to Black candidates.<sup>214</sup> The exclusion of Black participation in the General Assembly is not unique to one party, but at all times only one party has elected Black officials. Black representation and influence are necessarily stymied because only one party appears to be open.

I specifically analyzed certain areas of focus in this litigation, namely 3 Senate districts (16, 17, 23) and 8 House districts (74, 117, 124, 133, 134, 171, 173, 149), in the enacted plan to determine whether Black candidates have been elected to represent the areas represented in the districts, over the last 15 years. The districts I discuss here were identified for me by counsel. Because district boundaries (and their numbering) have changed over this period, I reviewed the state Senate and House district maps for the enacted plan (Exhibit B), the plan in effect from 2014-2020(Senate)/2015-2020(House) (Exhibit C), 2012-2014 (Senate)/2012-2015(House) (Exhibit D), and the 2006 plan that was in effect from 2006-2012 (Exhibit E), to identify the relevant districts that cover the same geographical area in prior districting plans for each Senate or House district at issue.<sup>215</sup> Using a database compiled by Carl Klarner, a political scientist who specializes in state legislative elections.<sup>216</sup> I identified the winner of each of the relevant state senate and house elections between 2006-2020 and the race of the winning candidate, in the geographical areas covered in the enacted plan, which is included in the Klarner database. I created a table of this information, attached here as Exhibit A.

Based on my analysis, I conclude that each of the enacted plan districts evaluated are comprised of large geographical areas that have not elected a Black candidate to the General Assembly over at least the last 15 years. I have limited this part of my evaluation to the past 15 years because that is the period for which Georgia makes its districting plans publicly available.<sup>217</sup>

<sup>212</sup> KlarnerPolitics. "Dr. Carl E. Klarner - Biography & CV," 2018. <https://www.klarnerpolitics.org/bio-1>; Robert A. Holmes, The Georgia Legislative Black Caucus: An Analysis of a Racial Legislative Subgroup, Sage Journal of Black Studies, Vol. 30 No. 6, July 2000 768-790; Fort Valley State University. "Alumni Profile: Willie Lee Talton: GA's first black Republican legislator since Reconstruction." <https://www.fvsu.edu/news/alumni-profile-willie-lee-talton> (describing Talton as the first Black Republican elected to the Georgia legislature since Reconstruction when he was elected in 2005).

<sup>213</sup> Robert A. Holmes, The Georgia Legislative Black Caucus: An Analysis of a Racial Legislative Subgroup, Sage Journal of Black Studies, Vol. 30 No. 6, July 2000 768-790.

<sup>214</sup> KlarnerPolitics. "Dr. Carl E. Klarner - Biography & CV," 2018. <https://www.klarnerpolitics.org/bio-1>.

<sup>215</sup> Georgia General Assembly. "Legislative and Congressional Reapportionment Office," 2022. <https://www.legis.ga.gov/joint-office/reapportionment>.

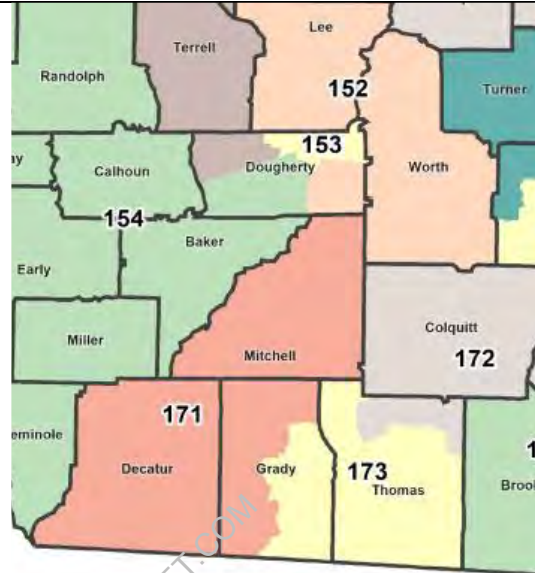
<sup>216</sup> KlarnerPolitics. "Dr. Carl E. Klarner - Biography & CV," 2018. <https://www.klarnerpolitics.org/bio-1>

<sup>217</sup> Georgia General Assembly. "Legislative and Congressional Reapportionment Office," 2022. <https://www.legis.ga.gov/joint-office/reapportionment>.

The following summarizes my findings:

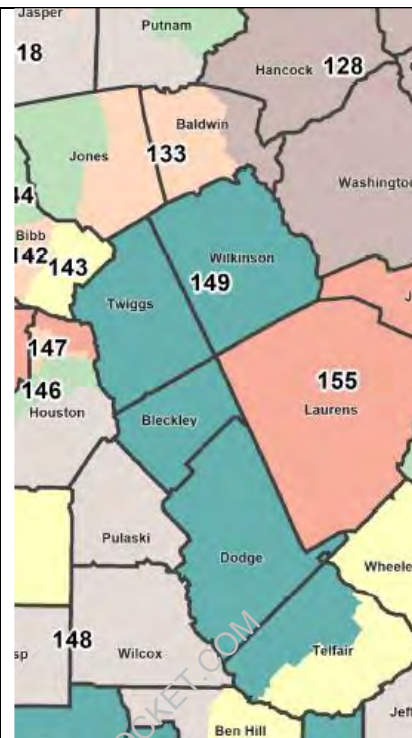
### **HD 171 & HD 173**

HD 171 includes Decatur County and portions of Mitchell and Grady counties that have not elected any Black representatives to the House in at least 15 years. The same is true of HD 173, which includes portions of Thomas and Grady counties.



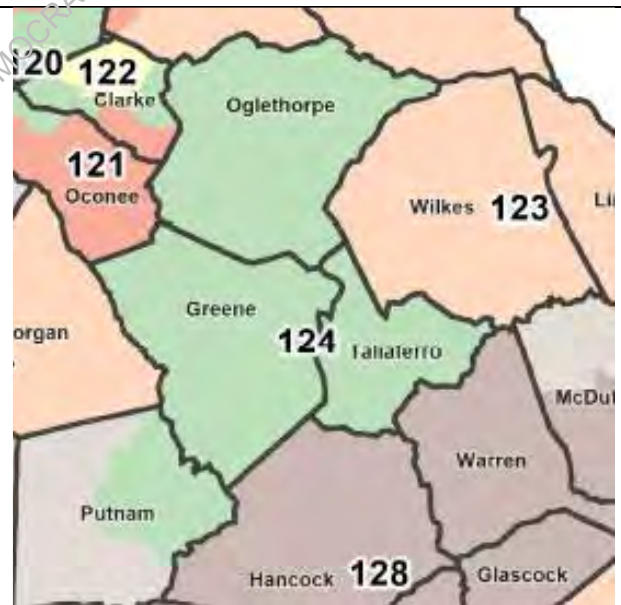
### **HD 133 & HD 149**

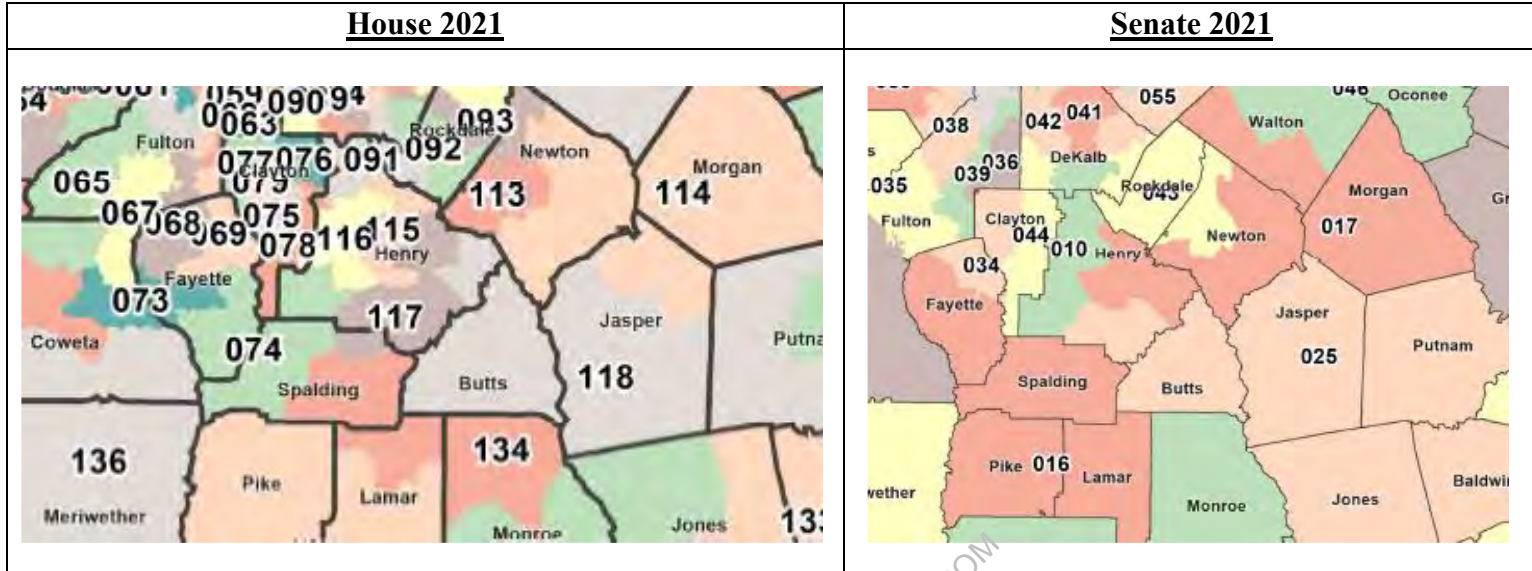
HD 133 includes portions of Jones and Baldwin counties that have not elected any Black representatives to the House in at least 15 years. The same is true of HD 149, which includes Wilkinson, Twiggs, Bleckley, and Dodge counties, as well as part of Telfair counties.



#### **HD 124**

HD 124 includes Oglethorpe, Greene, and Taliaferro counties, and as part of Putnam County, that has not elected any Black representatives in at least 15 years. There is one very small exception to this conclusion: a piece of the north east corner of Clarke County that has been included in enacted HD 124, was included in a different district from 2006-2010, and that former district did elect a Black representative during those years.



**HD 74, HD 117, HD 134, SD 16, & SD 17**

HD 134 includes portions of Spalding, Lamar, and Monroe counties that have not elected any Black representatives in at least 15 years.

HD 74 includes portions of Fayette, Spalding, and Henry counties that have not elected any Black representatives in at least 15 years. HD 74 also includes a portion of Henry County that, as part of a different district that included Clayton County, elected a Black candidate in 2006, thus that portion has not elected any Black representatives in the past 13 years.

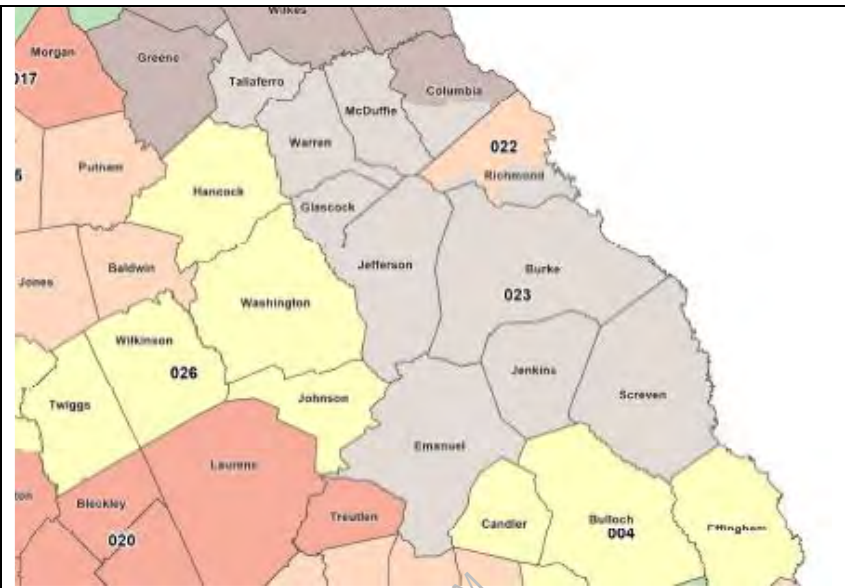
HD 117 includes a portion of Henry County and Spalding County that has elected few Black representatives to the House in at least 15 years. In three elections, small portions of enacted HD 117 were part of different districts, and those districts elected a Black representative.

SD 16 includes Spalding, Pike, Lamar, and part of Fayette County counties, the vast majority of which has not elected a Black candidate to the state Senate in at least 15 years. A small portion of Fayette County that is in enacted SD 16 was previously combined with part of Clayton County as part of former SD 34, which has elected a Black candidate.

SD 17 includes Morgan County, as well as parts of Henry, Newton, and Walton counties, the vast majority of which has not elected any Black candidates to the state in at least 15 years. A small portion of the part of Henry County that is included in SD 17 was from part of former SD 10, which was made up of DeKalb and Henry County, and elected a Black state senator.

**SD 23**

SD 23 includes Taliaferro, Warren, McDuffie, Glascock, Jefferson, Burke, Emanuel, Jenkins, and Screven counties, as well as portions of Columbia and Richmond counties, almost all of which have not elected Black candidates in at least 15 years. The small area of Richmond County between the border of enacted 22 and the border of Richmond County was part of SD 22 in the 2012-2020 map, and SD 22 has elected Black state senators.





## CONCLUSION

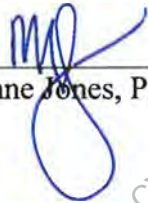
Historically, and contemporarily, Blacks have had poorer treatment, less access to the franchise and elected office. Blacks have not been elected to the degree that they should have based on the population of the state historically and today.

\*\*\*

I reserve the right to modify and/or supplement my opinions, as well as to offer new opinions.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Respectfully submitted and executed on January 13, 2022.



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Adrienne Jones, PhD, J.D.

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## **Exhibits**

**Exhibit A** ..... Data Concerning Certain Georgia State Legislative Officeholders 2006-2020

**Exhibit B** ..... 2021 Enacted Senate & House District Maps

**Exhibit C** ..... Senate Districts - Effective for 2014 Election & House Districts – 2015 Maps

**Exhibit D** ..... 2012 Senate & House District Maps

**Exhibit E** ..... 2006 Senate & 2006 House District Maps

**Exhibit F** ..... M. Adrienne Jones C.V.

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# Exhibit A

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for certain state house and state senate districts, with year and race of officeholder reported

Data source: Dr. Carl E. Klarner, Klarnerpolitics.org.

**HD 171 & HD 173**

<b>HD 171</b>			
<b>Year</b>	<b>HD171</b>	<b>HD172</b>	<b>HD173</b>
2020	White	White	N/A
2018	White	White	N/A
2016	White	White	N/A
2014	White	White	N/A
2012	White	White	N/A
2010	White	White	White
2008	White	White	White
2006	White	White	White

<b>HD 173</b>				
<b>Year</b>	<b>HD175</b>	<b>HD172</b>	<b>HD173</b>	<b>HD174</b>
2020	White	White	White	N/A
2018	White	White	White	N/A
2016	White	White	White	N/A
2014	White	White	White	N/A
2012	White	White	White	N/A
2010	White	White	White	White
2008	White	White	White	White
2006	White	White	White	White

for certain state house and state senate districts, with year and race of officeholder reported

Data source: Dr. Carl E. Klarner, Klarnerpolitics.org.

**HD 133 & HD 149****HD133**

Year	HD129	HD144	HD145	HD125	HD140	HD141
2020	White	White	White	N/A	N/A	N/A
2018	White	White	White	N/A	N/A	N/A
2016	White	White	White	N/A	N/A	N/A
2014	White	White	White	N/A	N/A	N/A
2012	White	White	White	N/A	N/A	N/A
2010	N/A	N/A	N/A	White	White	White
2008	N/A	N/A	N/A	White	White	White
2006	N/A	N/A	N/A	White	White	White

**HD149**

Year	HD154	HD144	HD149	HD140
2020	N/A	White	White	N/A
2018	N/A	White	White	N/A
2016	N/A	White	White	N/A
2014	N/A	White	White	N/A
2012	N/A	White	White	N/A
2010	White	White	N/A	White
2008	White	White	N/A	White
2006	White	White	N/A	White

**HD 124****HD 124**

Year	HD113	HD116	HD120	HD118	HD114	HD115
2020	N/A	N/A	White	White	N/A	N/A
2018	N/A	N/A	White	White	N/A	N/A
2016	N/A	N/A	White	White	N/A	N/A
2014	N/A	N/A	White	White	N/A	N/A
2012	N/A	N/A	White	N/A	N/A	N/A
2010	White	White	N/A	N/A	Black	White
2008	White	White	N/A	N/A	Black	White
2006	White	White	N/A	N/A	Black	White



for certain state house and state senate districts, with year and race of officeholder reported

Data source: Dr. Carl E. Klarner, Klarnerpolitics.org.

**HD 74, HD 117, HD 134, SD 16, & SD 17****HD 74**

Year	HD72	HD73	HD130	HD126	HD78	HD109	HD 111
2020	White	White	White	N/A	N/A	N/A	N/A
2018	White	White	White	N/A	N/A	N/A	N/A
2016	White	White	White	N/A	N/A	N/A	N/A
2014	White	White	White	N/A	N/A	N/A	White
2012	White	White	White	N/A	N/A	N/A	White
2010	White	White	N/A	White	White	White	N/A
2008	White	White	N/A	White	White	White	N/A
2006	White	White	N/A	White	Black	White	N/A

**HD 117**

Year	HD110	HD111	HD130	HD109	HD73
2020	White	Black	White	Black	N/A
2018	White	Black	White	White	N/A
2016	White	White	White	White	N/A
2014	White	White	White	White	N/A
2012	White	White	White	White	N/A
2010	White	N/A	N/A	White	White
2008	White	N/A	N/A	White	White
2006	White	N/A	N/A	White	Black

**HD 134**

Year	HD73	HD141	HD130	HD129	HD125	HD126
2020	White	White	White	White	N/A	N/A
2018	White	White	White	White	N/A	N/A
2016	White	White	White	White	N/A	N/A
2014	White	White	White	White	N/A	N/A
2012	White	White	White	White	N/A	N/A
2010	White	N/A	N/A	White	White	White
2008	White	N/A	N/A	White	White	White
2006	White	N/A	N/A	White	White	White

for certain state house and state senate districts, with year and race of officeholder reported

Data source: Dr. Carl E. Klarner, Klarnerpolitics.org.

**SD 16**

Year	SD16	SD34
2020	White	Black
2018	White	Black
2016	White	Black
2014	White	Black
2012	White	Black
2010	White	Black
2008	White	Black
2006	White	Black

**SD 17**

Year	SD17	SD25	SD46	SD10
2020	White	White	White	Black
2018	White	White	White	Black
2016	White	White	White	Black
2014	White	White	White	Black
2012	White	White	White	Black
2010	White	White	White	Black
2008	White	White	White	Black
2006	White	White	White	Black

**SD 23****SD 23**

Year	SD4	SD22	SD23	SD24	SD25
2020	White	Black	White	White	N/A
2018	White	Black	White	White	N/A
2016	White	Black	White	White	N/A
2014	White	Black	White	White	N/A
2012	White	Black	White	White	N/A
2010	White	N/A	White	White	White
2008	White	N/A	White	White	White
2006	White	N/A	White	White	White

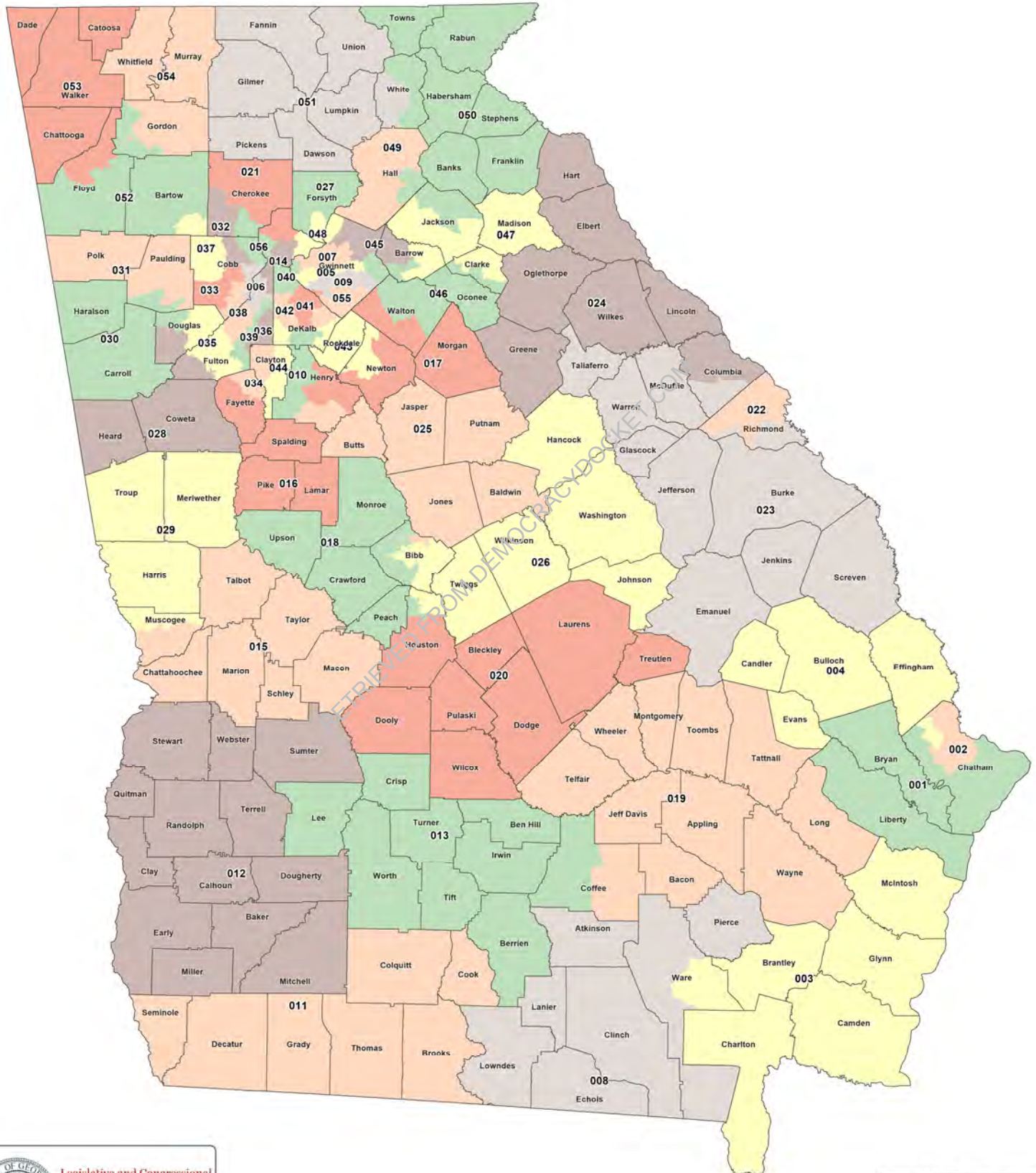
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# Exhibit B

## 2021 Enacted Senate & House District Map

\*Source: <https://www.legis.ga.gov/joint-office/reapportionment>

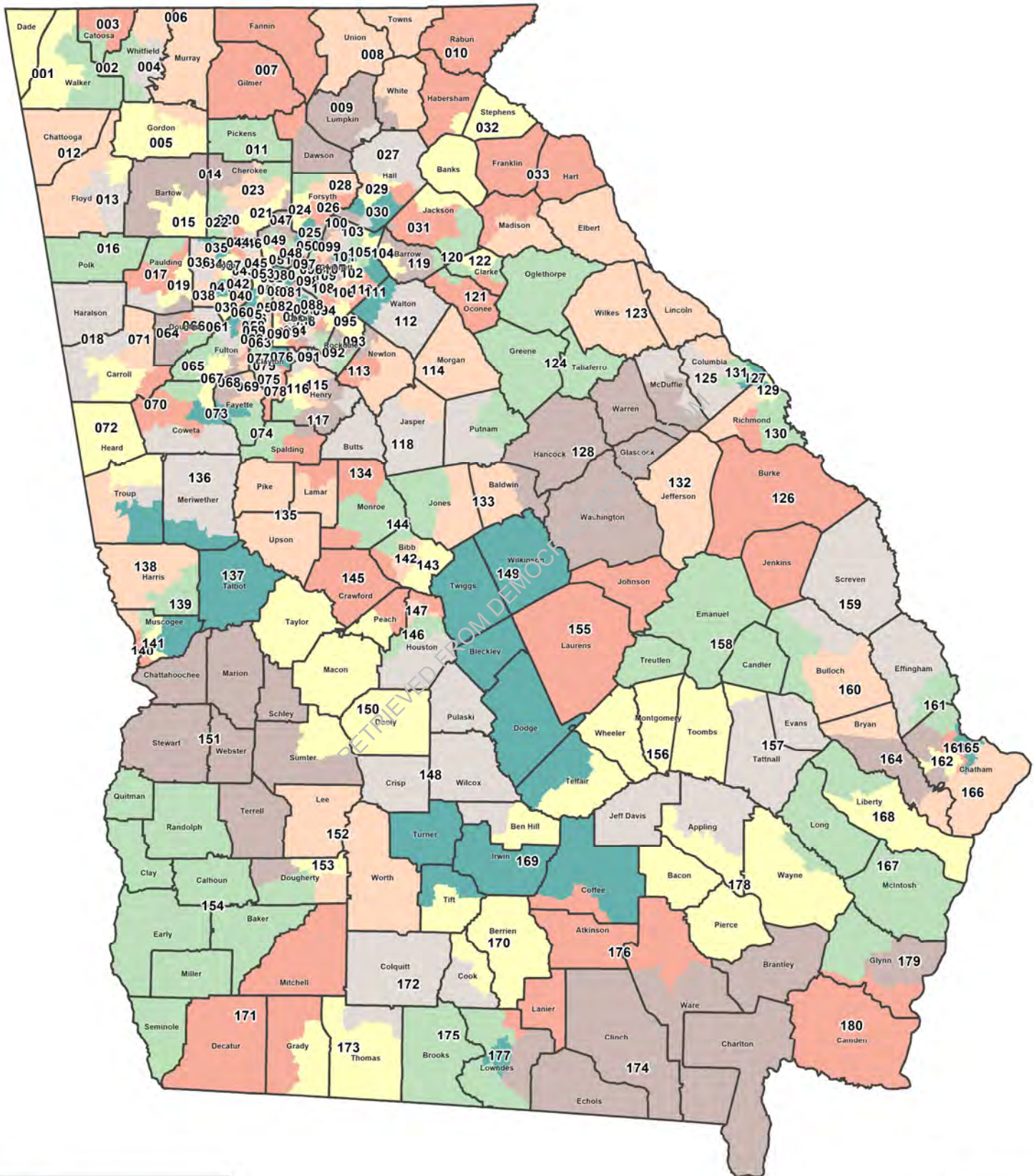
# Proposed Georgia Senate Districts





# Proposed Georgia House Districts

Client: H097  
Plan: House-prop1-2021  
Type: House



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Map layers  
District Layer  
County  
0 20 40  
Miles

# Exhibit C

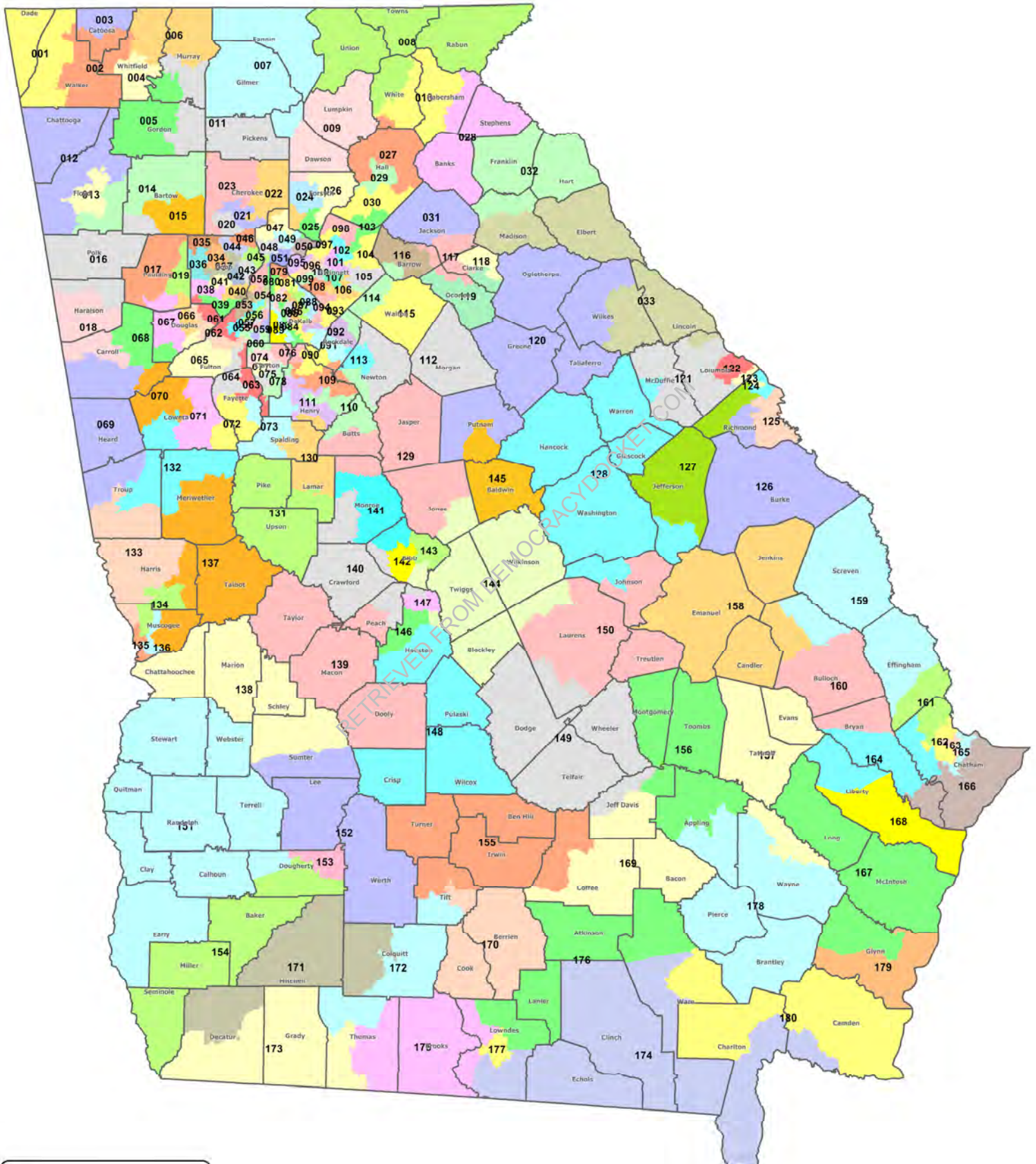
## Georgia Senate Districts - Effective for 2014 Election & Georgia House Districts - 2015

\*Source <https://www.legis.ga.gov/joint-office/reapportionment>







**Georgia House Districts- 2015**

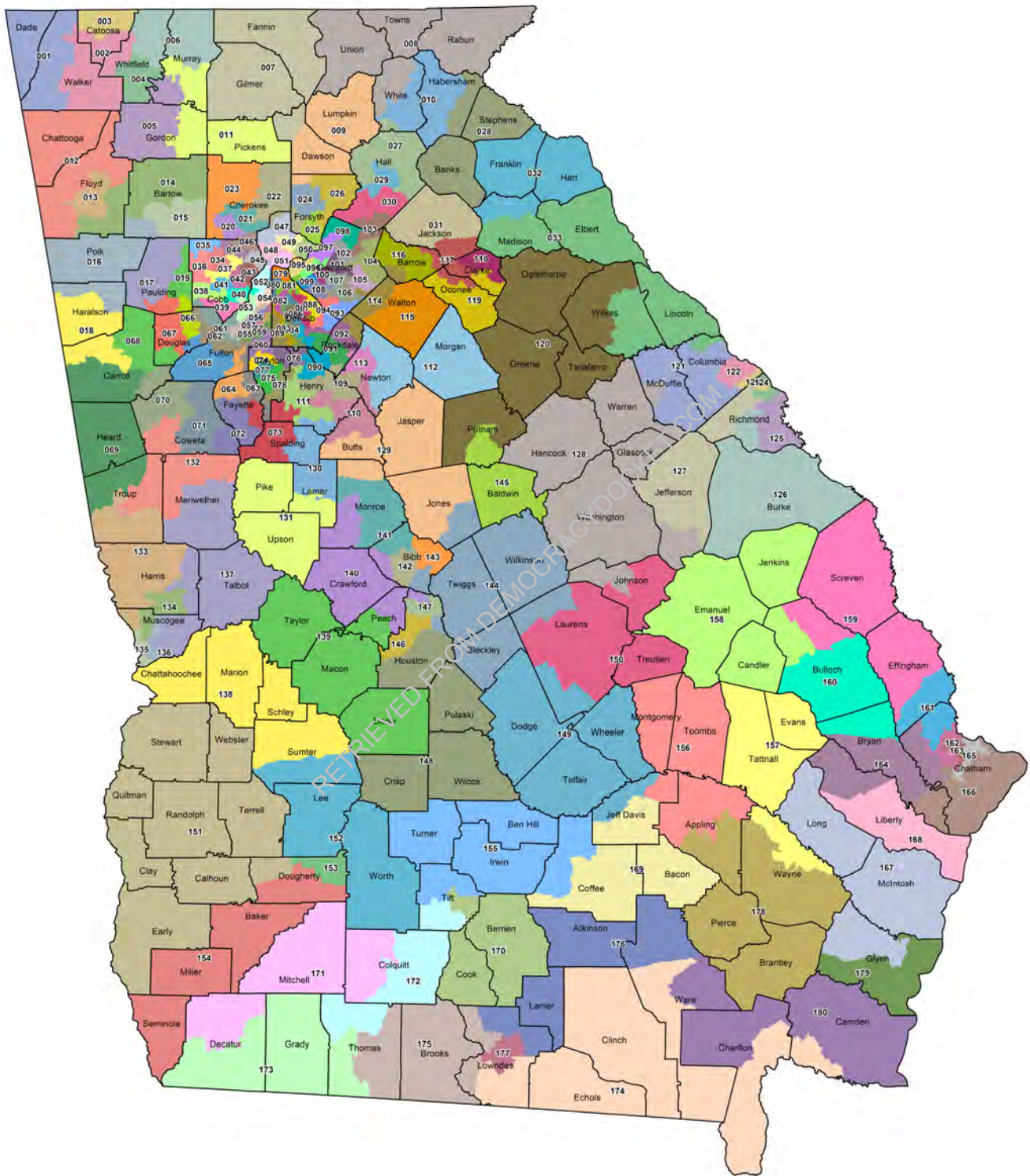
# Exhibit D

## 2012 Senate & House District Map

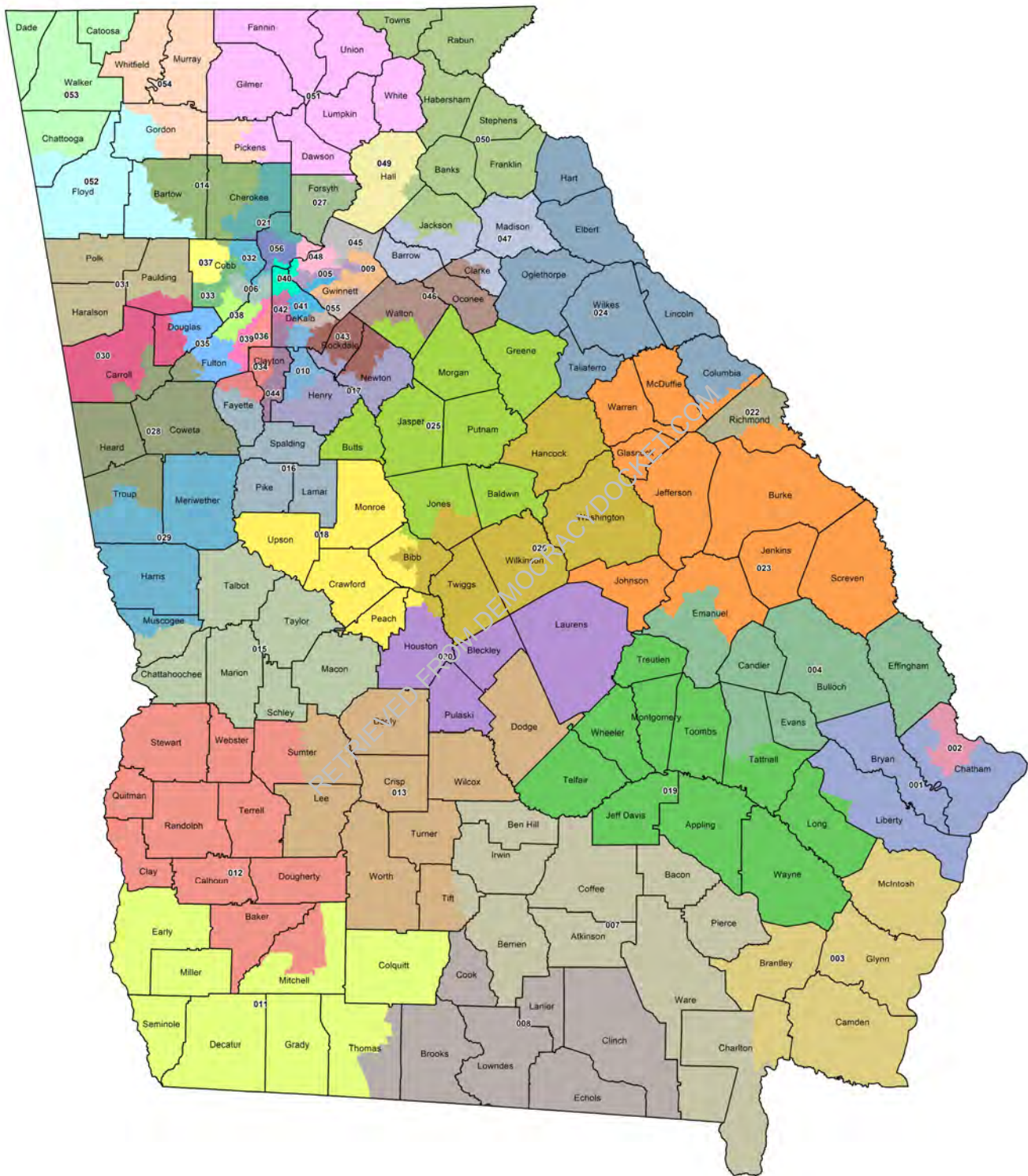
\*Source: <https://www.legis.ga.gov/joint-office/reapportionment>



# Senate 2012



# House 2012



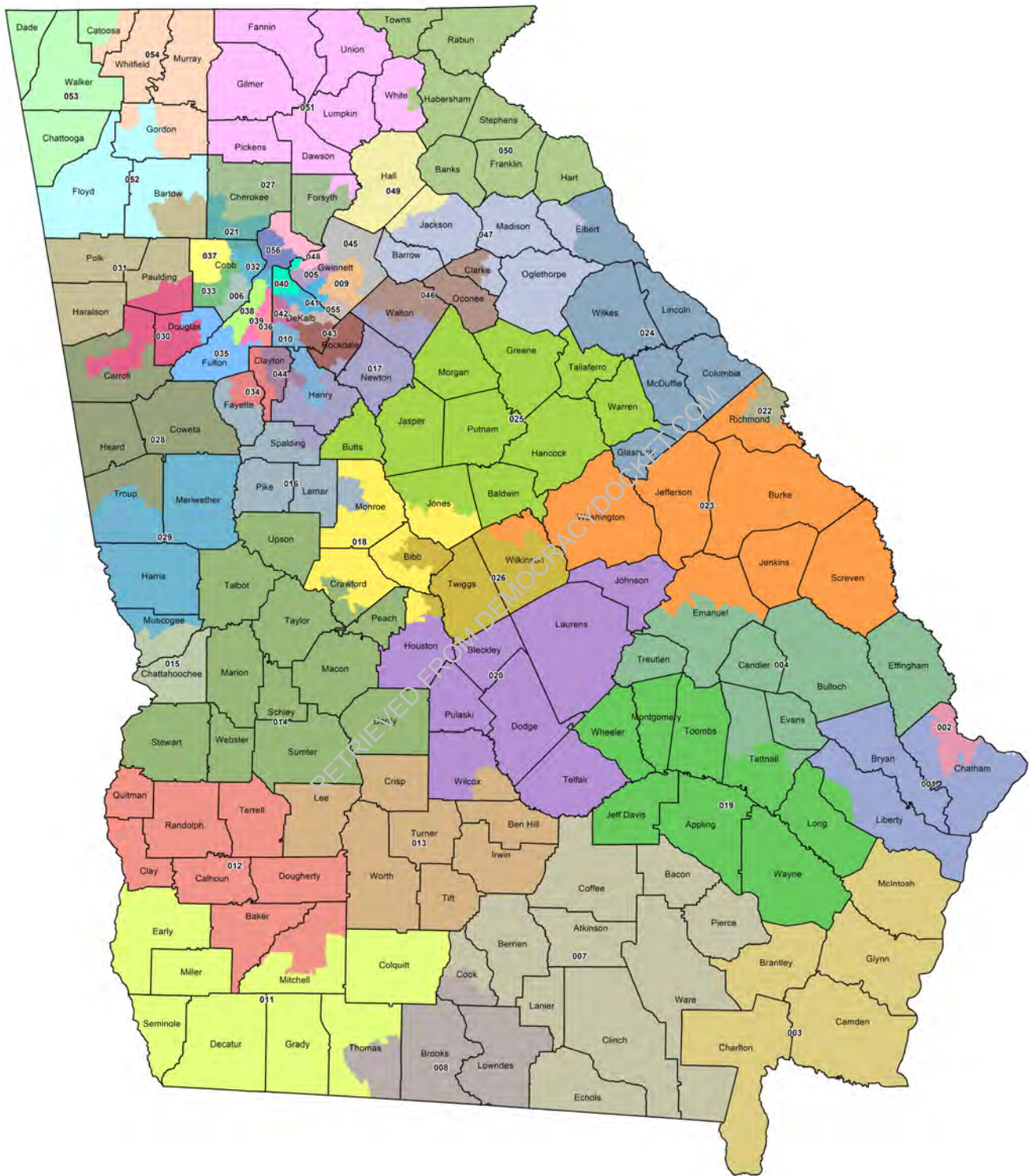
# Exhibit E

## 2006 Senate & 2006 House District Maps

\*Source <https://www.legis.ga.gov/joint-office/reapportionment>



## Senate 2006



## House 2006





# Exhibit F

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## **M. Adrienne Jones**

950 Ponce de Leon Ave. NE Apt. #8  
Atlanta, GA 30306  
646-522-1029

[adrienne.jones@morehouse.edu](mailto:adrienne.jones@morehouse.edu)

### **Education**

**Ph.D.** Political Science, City University of New York Graduate Center, 2015  
**M.Phil.** Political Science, City University of New York Graduate Center, 2013  
**J.D.** University of California at Berkeley, 1996  
**B.A.** Modern Culture and Media (Semiotics), Brown University, 1993

### **Professional Experience**

<b>Expert Witness</b> , ACLU	2021-present
<b>Democracy Reform Expert</b> , Union of Concerned Scientists	2021- present
<b>Instructor</b> , Open University, Minnesota Dept. of Corrections	2020- 2021
<b>Expert Witness</b> , Lawrence & Bundy, Atlanta, GA	2019-present
<b>Assistant Professor</b> , Dept. of Political Science, Morehouse College	2017-present
<b>Director of Pre-Law</b> , Dept. of Political Science, Morehouse College	2017- present
<b>Visiting Professor</b> , Dept. of Political Science, Radford University	2016-2017
<b>Speechwriter for the Chancellor</b> , University of Wisconsin-Platteville (UWP)	2016- present
<b>Interim Director of Transition</b> , External Affairs, UWP	2015- 2016
<b>Opinion Editorial Writer</b> , The Dubuque Telegraph Herald (monthly)	2015-present
<b>Adjunct Lecturer</b> , Dept. of Social Science, UWP	2014- 2016
<b>Chief Public Relations Officer</b> , Office of the Chancellor, UWP	2014-2015
<b>Faculty Fellow</b> , Dept. of Social Science, UWP	2011-2014
<b>Adjunct Professor</b> , Dept. of Political Science, City College of New York (CCNY) and the Center for Workers Education (CWE)	2001-2011
<b>Pre-Law Advisor</b> , Pre-Law Program, CCNY	2006-2011
<b>Director</b> , Mock Trial and Moot Court Programs, CCNY	2003- 2011

### **Publications**

Jones, M. Adrienne and Polsky, Andrew, How to Win a Long Game: The Voting Rights Act, The Republican Party, and the Politics of Counter- Enforcement, *Political Science Quarterly*, Vol. 136 – Number 2, Summer 2021. <https://www.psqonline.org/>

Jones, Adrienne, “Voting in Georgia runoff went better than June’s disastrous primary, but trouble still lingers, *The Conversation*, January 5, 2021.

Jones, Adrienne, “Georgia’s Election Disaster Shows How Bad Voting in 2020 Can Be,” *The Conversation*, July 21, 2020.

Jones, M. Adrienne, “When Yes Means No: GOP Congressional Strategy and the Reauthorization of the VRA in 2006.” *The Forum*, 16(2), 2018, pp. 289-312. Retrieved 17 Oct. 2018, from doi:10.1515/for-2018-0014.

Jones, Adrienne, “It’s a War Movie,” *Satya*, pp.48-53, 2016.

Op-Ed, “Erosion of the Voting Rights Act Threatens Fair Elections,” *Dubuque Telegraph Herald*, August 8, 2015.

Op-Ed, “Confederate Flag Still a Sign That War Not Settled,” *Dubuque Telegraph Herald*, July 19, 2015.

Op-ed, “The March on Selma: What’s the Big Deal?” *Dubuque Telegraph Herald*, March 15, 2015.

Op-ed, “Supreme Court Decision a Sad Step Backward for Voting Rights,” *Dubuque Telegraph Herald*, July 28, 2013.

Op-ed, “Scalia, Section 5 of the Voting Rights Act,” *Dubuque Telegraph Herald*, June 9, 2013.

## **Public Scholarship**

Panelist, Political Rewind, GPB, 12/8/21

Panelist, Political Rewind, GPB, <https://www.gpb.org/news/2021/11/22/political-rewind-contrasts-between-trials-of-rittenhouse-and-trio-charged-in-ahmaud>

Expert, The Special Report with Areva Martin, 11/13/21, Homer Plessy on Road to Pardon, Expert, Welcome to Atlanta Where the World Series Collides with Culture Wars, USA Today (TBA) [10/27/21 interview Gabe Lacques]

<https://www.usatoday.com/story/sports/mlb/2021/10/29/world-series-collides-politics-astros-braves-meet-atlanta/6185323001/?gnt-cfr=1>

Panelist, Political Rewind, <https://www.gpb.org/news/2021/10/20/political-rewind-plans-reintroduce-voting-rights-act-redistricting-could-pit-dems>, GPB, 10/20/21

Panelist, Political Rewind, GPB, <https://www.gpb.org/news/2021/09/01/political-rewind-call-get-vaccinated-ga-hits-new-covid-peaks-big-names-at-gop-fish>, 9/1/21

Expert, Rep. Terri Sewell's voting rights bill just passed the House. Meet the Black women who paved her way. The Lily, 8/26/21 <https://www.thelily.com/rep-terri-sewells-voting-rights-bill-just-passed-the-house-meet-the-black-women-who-paved-her-way/>

Panelist, Political Rewind, <https://www.gpb.org/news/2021/08/18/political-rewind-lawmakers-prepare-redraw-district-maps-and-georgians-plea-for-fair>, GPB, 8/18/21

Panelist, [Political Rewind: The Coming Eviction Crisis Amid COVID: Voting Rights And Redistricting In Flux](#), GPB, 8/2/21

Panelist, Political Rewind, [Political Rewind: National Debate Around Election Laws And Voting Rights Lands In Georgia](#), GPB, 7/19/21

Panelist, [Political Rewind: Education, Race And Academic Freedom As Ga. Seeks Chancellor. Hannah-Jones Tenured](#) GPB 7/1/21

Featured Panelist, Inside Merrick Garland's Vision of Justice, On Point, NPR, 6/21/21 <https://www.wbur.org/onpoint/2021/06/21/merrick-garlands-vision-of-justice>

Panelist, State Influence over GA. Elections Raises Concerns; What's Next for Buckhead? Political Rewind, GPB, 6/21/21 <https://www.gpb.org/news/2021/06/21/political-rewind-state-influence-over-ga-elections-raises-concerns-whats-next-for>

Expert, Stone Mountain Confederacy Removal? The World Tonight, BNC, 5/24/21 [Dr. Jones 5.24.mp4](#)

Panelist, Georgia Voting Rights: Withstanding the Fight Against Voter Suppression, The Players Coalition, 4/29/21

Interviewer, Conversations About Women in International Relations and Global Aspects of Gender Equality, International Women's Day Leadership Forum of Atlanta, 4/28/21

Panelist, Hope, Enfranchisement and Voter Suppression: South Africa and the USA, Andrew Young Center, 4/26/21

Panelist, Flash Panel, Jim Crow 2.0?, Oregon State University, 4/13/21

Expert, GPB TV Australia, Planet Animal, SB 202 Georgia Voting Legislation, 4/8/21 <https://www.abc.net.au/news/programs/planet-america/2021-04-09/planet-america-9-april/13296640>

Presenter, Democracy Under Threat in Times of Populism and Racial Nationalism Conference, 3/25/21

Interviewer, A Fireside Chat With David Kelly '96, Chief Legal Golden State Warriors, 3/10/21

Keynote, Voter Suppression in Georgia, with Rabbi Lydia Medwin at The Temple, 3/1/21

Panelist, Westlake High School Constitutional Law Panel with Dexter Weldon, 2/18/21

Expert, Georgia Runoff Election, NPR, On Point, 1/4/21

Expert, Georgia Elections (Senate Races) MSNBC with Craig Melvin, 12/7/20

Keynote Speaker, Politics & Pandemics & 2020 Vision The View from Georgia, The Brown Club of Georgia Presents, 11/17/20

Panelist, And the Winner Is ... Post Election Analysis, Morehouse Journalism and Sports Program 11/12/20

Moderator, Andrew Young Center, Moral and Political Dimensions of this High Stakes Election, with Robert Franklin, Mayor Steven L. Reed, and Rev. Rafael Warnock, 10/27/20

Expert, Election Night, WURD on Politics, Philadelphia, WURD, November 3, 2020.  
<https://www.youtube.com/watch?v=h0SB6mB5v0U>

Expert, Areva Martin Show, Georgia Run Off Elections, 11/9/2020 <https://bit.ly/SRep100>

Expert, Areva Martin Show, Georgia Primary Election/Voter Suppression, 10/21/2020  
<http://bit.ly/SRep92>

Expert, How States Voted in Every Presidential Election, From George Washington to Donald Trump, Business Insider, October 15, 2020 <https://www.businessinsider.com/presidential-election-results-every-year-donald-trump-2020-10>

Expert, Battleground Ballot Box, The History of Racist Voting Laws in Georgia, Georgia Public Radio, October 12, 2020 <https://www.gpb.org/news/2020/10/12/battleground-ballot-box-the-history-of-racist-voting-laws-in-georgia>

Panelist, Teach In, Higher Education in Prisons, ICW Democracy Under Threat, September 18, 2020 "[Higher Education in Prisons](#)"

Expert, BBC World News, US: March on Washington, August 28, 2020 <https://we.tl/t-FXv6NVTHjn>

Panelist, Teach In, Racial Justice Protests and Social Change, ICW Democracy Under Threat, July 28, 2020.

Expert, Indus News, *Scope with Waqur Rizvi* US: Minneapolis Protests/George Floyd, July 30, 2020  
[https://www.youtube.com/watch?v=cwLRW\\_u4W0k](https://www.youtube.com/watch?v=cwLRW_u4W0k)

Expert, Indus News, *Scope with Waqur Rizvi* US Voting System Meltdown in Georgia, June 12, 2020 <https://www.youtube.com/watch?v=gmwEOmbegMo&feature=youtu.be>

Keynote Speech, "African Americans and the Vote," National Labor Relations Board, WDC, February 27, 2020.

Keynote Speech, "Black History Month Tea at Three," U.S. Attorneys Office for the Northern District of Georgia, February 20, 2020.

Interviewer, Pete Buttigieg at Morehouse College, New Deal Democrats, November 18, 2019

Interviewee, "Minority Turnout is Low In Runoff Elections And That Will Matter," December 4, NPR, GPB News, November 30, 2018.

Presenter, Morehouse College Crown Forum w/Byron Hurt, October 11, 2018.

Panelist, "The Politics of Rape," Morehouse College, Brisbane Inst., October 10, 2018.

Presenter, Crown Forum w/ John A. Powell, February 22, 2018.

Panelist, *When Yes Means No the GOP and VRA*, Southern Political Science Association, New Orleans, January 2018.

Moderator, Know Your Rights Panel, Crown Forum After Dark, October 25, 2017.

Moderator, Crown Forum After Dark, *Crown Heights* Panel, August 22, 2017.

Presenter, "The Voting Rights Act Under Siege: The Development of the Influence of Colorblind Conservatism on Congress and the Voting Rights Act," City University of New York Political Science Job Talk Colloquium, New York, NY, September 11, 2014.

Panelist, "Citizen Koch," Screening and Panel Discussion at Mindframe Theater, Dubuque IA, August 17, 2014.

Guest Speaker, Introduction to Politics, "The VRA Today," UWP, Platteville, WI, October 3, 2013.

Panelist, "Voting in Iowa," Chambers Government Committee Meeting on the Legislative Agenda, Dubuque, IA, September 12, 2012.

Presenter, "Voting Rights Act: Redistricting in Covered States," 2012 Midwest Political Science Association (MPSA) Annual Meeting, Chicago, IL, April 12, 2012.

Speaker, "The Voting Rights Act and Redistricting in 2011," Invited Lecture for the Social Science Lecture Series, UWP, Platteville, WI, January 27, 2011.

## **Quoted**

Michael Jones, Keep your eyes on Georgia, *Supercreator News*, November 30, 2021,  
<https://www.supercreator.news/p/keep-your-eyes-on-georgia>

Janay Kingsberry, "Rep. Terri Sewell's voting rights bill passed the House. Meet the Black women who paved her way." Washington Post: The Lily, August 25, 2021, <https://www.thelily.com/rep-terri-sewells-voting-rights-bill-just-passed-the-house-meet-the-black-women-who-paved-her-way/>

Greg Bluestein Stacey Abrams Hasn't Said if She'll Run for Governor, Republicans Act Like She Already Is," *Atlanta Journal Constitution*, 8/21/21, <https://www.ajc.com/politics/stacey-abrams->

[hasnt-said-if-shell-run-for-governor-republicans-act-like-she-already-is/2CL75C26MVFVDBFP7QG7EH6QZI/](https://thehill.com/policy/finance/567486-black-farmers-facing-extinction-fight-for-5-billion-in-promised-aid?rl=1)

Aris Folley and Marty Johnson, Black farmers facing 'extinction' fight for \$5B in promised aid, The Hill, 8/12/21, <https://thehill.com/policy/finance/567486-black-farmers-facing-extinction-fight-for-5-billion-in-promised-aid?rl=1>

Eva Rothenberg, For Black Georgians, Voting Restrictions are More of the Same, CNN 3/28/21, <https://www.cnn.com/2021/03/28/us/georgia-voting-jim-crow-slave-narratives/index.html>

Profs argue Georgia runoffs are racist, Campus Reform, Tuesday, 1/5/21

<https://www.campusreform.org/article?id=16567>

## **Fellowships and Awards**

<b>Andrew Young Center for Global Leadership Fellowship</b> , Morehouse College	2019-2020
<b>Faculty Fellowship</b> , University of Wisconsin, Platteville	2011-2014
<b>Black Male Initiative Fellowship Award</b> , CUNY	2010
<b>Dean K. Harrison Fellowship</b> , CUNY	2011, 2013 and 2014

## **Professional Service**

<b>Board Member</b> , Protect the Vote	2021- present
<b>Democracy Council Member</b> , Union of Concerned Scientists	2020-present
<b>Board Member</b> , JAMII	2020- present
<b>Board Member, More Equitable Democracy</b> present	2020y-
<b>DNC Boiler Room</b> , Fulton County	2018- present
<b>Alum Member</b> , GC Alumni Committee, Political Science Department, City University of New York Graduate Center	2018- present
<b>Secretary</b> , Faculty Council, Morehouse College	2019-present
<b>Member</b> , Faculty Council, Morehouse College	2018- present
<b>Student Member</b> , Executive Committee, Political Science Department, City University of New York Graduate Center	2009-2011
<b>Moot Court Judge</b> , Loras College Annual Moot Court Competition	2010-2016
<b>Board Member and Organizer</b> of the 2012 Multicultural Inclusive Conference, University of Wisconsin, Platteville	2011-2012
<b>Faculty Representative</b> , University Strategic Planning Committee for Diversity, University of Wisconsin-Platteville	2013- 2015
<b>Judge for Leadership Awards</b> , University of Wisconsin, Platteville,	2013

## **Employment History**

<b>Assistant Editor</b> , ABA Sports and Entertainment Law Journal	1996-1997
<b>Staff Attorney</b> , United States Court of Appeals	1996-1999
<b>Independent Filmmaker</b> , New York City, Los Angeles	1996-2007
<b>Interviewer</b> , The History Makers	2007-2008
<b>Staff Attorney</b> , Communications Workers of America	2008-2011

## **Membership in Volunteer and Professional Societies**

Brooklyn Salon	2010-present
Writer, Class News, Hathaway Brown School	2012 -present
Member, New York Bar Association	2007-present
Co-Chair, MAC Committee, Brown Alumni Association	2018-2020
Member, Brown Alumni Association Board	2014-2020
Treasurer, Inman Page Black Alumni Council	2012- 2014
Treasurer, Black Documentary Collective	2006-2011
Member, North American Pre-Law Association	2005-2011



# EXHIBIT D

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**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA**

**ATLANTA DIVISION**

ALPHA PHI ALPHA FRATERNITY INC.,  
et al.;

*Plaintiffs,*

vs.

BRAD RAFFENSPERGER, in his official  
capacity as Secretary of State of Georgia.

*Defendant.*

Case No. 1:21-cv-05337-SCJ

**EXPERT REPORT OF DR. TRACI BURCH**

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## **BACKGROUND AND QUALIFICATIONS**

My name is Traci Burch. I am Associate Professor of Political Science at Northwestern University and Research Professor at the American Bar Foundation. I received my Ph.D. in Government and Social Policy from Harvard University in 2007.

Over the past 15 years, I have led several large, long-term quantitative and qualitative research projects on political participation in the United States. I have participated in and coauthored several book chapters and articles that examine race, political participation, and inequality. For instance, I have worked with Professors Kay Schlozman, Sidney Verba, and Henry Brady on book chapters and articles related to the causes and consequences of inequality in political participation. I also collected data on congressional hearings and interest group activities for that book. For my coauthored article with Jennifer Hochschild and our book with Vesla Weaver, I analyzed the legislative history of several racial policies, including the 1965 Hart-Cellar Act. We also explore political participation and attitudes in our book as well.

I am widely regarded as an expert on political behavior, barriers to voting, and political participation. My work has been widely cited and replicated and has won several awards. My dissertation on the effects of felony disenfranchisement on voting in North Carolina, Georgia, and other states, “Punishment and Participation: How Criminal Convictions Threaten American Democracy” won the Robert Noxon Toppan Prize for the Best Dissertation on a Subject of Political Science at Harvard in 2007. I also achieved national recognition for this work; the dissertation was also awarded the E.E. Schattschneider Award from the American Political Science Association for the best dissertation in American Government, and the William Anderson Award for the best dissertation in federalism, intergovernmental relations, and state and local politics. Several articles from this dissertation, including work evaluating voting patterns among people with felony convictions in North Carolina, Georgia, Florida, Missouri, and Michigan, have been published in leading peer-reviewed journals. In particular, my articles “Did Disfranchisement Laws Help Elect President Bush? New Evidence on the Turnout and Party Registration of Florida’s Ex-Felons” and “Turnout and Party Registration among Criminal Offenders in the 2008 General Election,” which appeared in the peer-reviewed journals *Law and Society Review* and *Political Behavior*, respectively, included my calculations of felony disenfranchisement.

My academic book on the community-level effects of criminal convictions on political participation, *Trading Democracy for Justice*, was published by the University of Chicago Press and also won multiple national awards from the American Political Science Association and its sections, including the Ralph J. Bunche Award for the best scholarly work that explores the phenomenon of ethnic and cultural pluralism and best book awards from the law and politics and urban politics sections. *Trading Democracy for Justice*, as well as the articles “The Effects of Imprisonment and Community Supervision on Political Participation,” “Did Disenfranchisement Laws Help Elect President Bush?,” “Skin Color and the Criminal Justice System,” and “Turnout and Party Registration among Criminal Offenders in the 2008 General Election” rely on the analysis of data from Georgia.

I have testified before the U.S. Commission on Civil Rights about the collateral consequences of felony convictions with respect to voting and other issues. I have received

several grants for my work, including a grant from the Stanford University Center on Poverty and Inequality. I also serve as co-Principal Investigator on a National Science Foundation grant that supports graduate and postdoctoral fellowships at the American Bar Foundation. I have served on the editorial boards of leading journals including *Political Behavior* and *Law and Social Inquiry*. Currently, I am on the Board of Overseers for the General Social Survey, a longstanding national public opinion survey run by the National Opinion Research Center at the University of Chicago. I routinely review the work of my peers for tenure, scholarly journals, university presses, and grants and have served as a reviewer for the *American Political Science Review*, *The American Journal of Political Science*, *The Journal of Politics*, *Political Behavior*, the National Science Foundation, Cambridge University Press, Princeton University Press, the University of Chicago Press, Oxford University Press, and many other entities. I also am a member of the Executive Council of the Elections, Public Opinion, and Voting Behavior Section of the American Political Science Association.

My curriculum vitae is provided in the Appendix. I am being compensated \$350 per hour for work in this case, plus expenses. My compensation is not contingent on the analysis and opinions offered or on the outcome of this litigation. This is my sixth engagement as an expert witness. I previously testified at trial and in a deposition in a case in federal district court in Florida, (*Jones vs. DeSantis*, Consolidated Case No. 4:19-cv-300), at trial and in a deposition in a case in Wake County Superior Court in North Carolina (*Community Success Initiative, et al. v. Moore*, No. 19-cv-15941), and at trial and in a deposition in federal district court in Alabama (*People First of Alabama, v. Merrill*, No. 2:20-cv-00619-AKK). The trial courts relied on my expert testimony and I was cited in the courts' opinions in both *Jones v. DeSantis* and in *People First of Alabama v. Merrill*. No opinion in *Community Success Initiative v. Moore* has yet been issued. Recently, I was deposed in a case in federal district court in Florida (*Florida State Conference of the NAACP v. Lee*, No. 4:21-cv-00187-MW-MAF) and in a consolidated case in federal district court in the Western District of Wisconsin (*One Wisconsin Institute Inc. v. Jacobs*, No. 15-CV-324-JDP and *Luft v. Evers*, No. 20-CV-768-JDP).

### **SCOPE OF THE REPORT**

I was asked by the attorneys for the plaintiffs in this case to provide information relevant for evaluating Senate Factor 5, or "the extent to which minority group members bear the effects of discrimination in areas such as education, employment, and health, which hinder their ability to participate effectively in the political process," particularly with respect to Black Georgians. I was also asked to discuss an additional factor, "whether there is a lack of responsiveness on the part of elected officials to the particularized needs of minority group members."

In formulating my opinions, I relied on my analysis of standard sources for political scientists such as the reviews of scholarly literature and the analysis of demographic data, government reports, and public opinion surveys where noted.



## **SUMMARY OF CONCLUSIONS**

Based on my analyses and review of the scholarly literature, I offer the following opinions:

- Socioeconomic factors affect political participation. The persistent effects of discrimination in Georgia are substantially demonstrated in the significant racial disparities in socioeconomic outcomes between White and Black Georgia residents. These outcomes are caused, in part, by historical and contemporary state policies that perpetuate racial segregation in education and housing, and that fail to address adequately discrimination in housing and employment markets. Disproportionate involvement with the criminal justice system also affects the racial disparity in socioeconomic outcomes.
- Racial residential segregation also affects political participation, and racial residential segregation is a persistent factor shaping the lives of Georgians. Racial residential segregation leads to lower socioeconomic status, worse health, and greater encounters with the criminal justice system. Racial residential segregation in Georgia is the result of both historical and contemporary policies at the local and state levels.
- Political participation also is shaped by health status. Black Georgians are worse off with respect to a number of health outcomes than White Georgians. Black Georgians fare worse in terms of infant mortality, hypertension, diabetes, obesity, and overall mortality rates than White Georgians.
- Contact with the criminal justice system directly affects the political behavior of people with felony convictions, and also has been shown to decrease voter turnout at the neighborhood level. Here too, Black Georgians also face worse outcomes in the criminal justice system, which studies have shown result partly from historical and contemporary discrimination in arrest and sentencing. In addition, felony disenfranchisement directly prevents a disproportionate share of Black Georgians from voting.
- Persistent racial gaps in outcomes with respect to socioeconomic indicators, health status, and criminal justice involvement demonstrate a lack of responsiveness by public officials to the needs of Black Georgians. Racial gaps in satisfaction with outcomes, political figures, and public services demonstrate that Black Georgians perceive a lack of responsiveness of governmental officials to their needs.

## **DISCUSSION**

### **Evidence of Racial Discrimination in Education, Health, and Other Areas of Life**

In the following discussion, I highlight racial disparities in socioeconomic indicators such as education, income, poverty, and employment; residency location and stability; health status and disease incidence; and criminal justice involvement using census, survey, and other administrative data from agencies such as the Centers for Disease Control and the Georgia Department of Corrections. For each arena, I review the scholarly literature to show how historical and current racial discrimination and state actions contribute to racial disparities among Georgians today. Also, I discuss how each arena affects politics, particularly voting behavior.

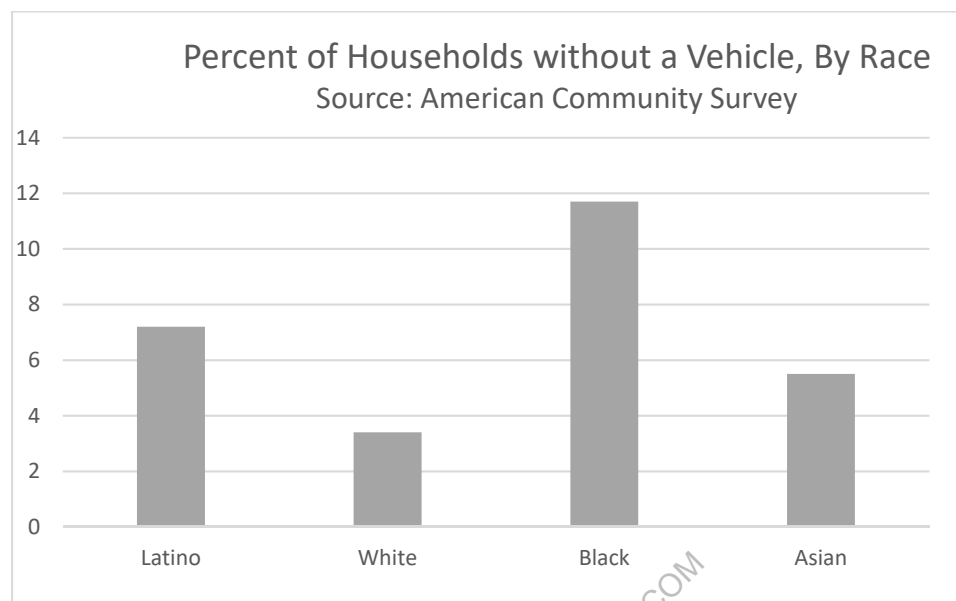
*The Effects of Socioeconomic Status on Political Participation*

Socioeconomic status predicts voting. Rational choice theory provides one way of thinking about the decision to engage in political activity. Rational choice theory posits that individuals choose to participate in or abstain from politics based on whether they believe the benefits they receive from participation will outweigh the associated costs of activity (Downs 1957). Most acts of participation are costly in that the tasks of acquiring political information, attending meetings, registering, or donating to campaigns require time and money (Downs 1957; Verba and Nie 1972; Verba, Schlozman, and Brady 1995a). Because the likelihood that one individual will make a difference in the electoral outcome is small, calculations based solely on this expected benefit mean that no one would ever participate (Downs 1957). However, social, economic, emotional, and other institutional factors also can enter the calculus and make the decision to participate more or less rational for a given individual. Such factors tend to have the effect of increasing or decreasing the benefits and costs of political activity (Uhlener 1995).

Verba, Schlozman, and Brady argue that the relationship between socioeconomic status and voting exists because people with greater income and education also tend to have more of the resources such as time, money, and civic skills that affect the calculus of participation (1995: 282). In other words, people with greater resources are better able to bear the costs of participation (Downs 1957).

Different aspects of socioeconomic status influence participation in particular ways. Educational attainment is one of the most fundamental explanatory variables with respect to political participation (Almond and Verba 1963; Brady, Verba, and Schlozman 1995; Burden 2009; Campbell et al. 1980; Verba, Schlozman, and Brady 1995b). Voters with higher educational attainment are more likely to vote. Verba, Schlozman, and Brady argue that education makes it easier for individuals to navigate the costs of voting such as acquiring information about the candidates and issues or learning how to register and vote (Verba, Schlozman, and Brady 1995b).

Financial considerations also affect voting. People with higher incomes are more likely to vote (Brady, Verba, and Schlozman 1995; Campbell et al. 1980; Franko, Kelly, and Witko 2016; Leighley and Nagler 1992). This relationship may be caused by many factors. For instance, higher income people may face lower opportunity costs of taking time off work to vote and to acquire political information. Transportation to and from the polls also may be easier for higher income voters. For instance, Figure 1 shows that among Georgians, access to vehicles varies by race: data from the 2019 American Community Survey show that Black Georgia households are more than twice as likely as White households to lack access to a car.

*Figure 1: Percent of Georgia Households without a Vehicle, by Race*

Employment also may affect voter turnout. First, white collar occupations may give employees a greater opportunity to develop civic skills that can be useful in navigating electoral bureaucracies (Almond and Verba 1963; Verba, Schlozman, and Brady 1995b). Salaried workers also may have greater freedom to take time off work without risking their pay. Rosenstone and Hansen argue that work is an important site for recruitment into politics, which also increases voter turnout (Rosenstone and Hansen 1993).

In Georgia, voter turnout varies by race. As shown in Table 1, based on the 2020 Current Population Survey Voting Supplement, voter turnout among White Georgians was 66.6%, while voter turnout among Black Georgians was 60.9%. Table 1 also shows voter turnout by race and educational attainment for the 2020 election, and it is clear from the evidence that differences in socioeconomic status by race help explain this disparity. Georgia follows the pattern described in the political science literature: voter turnout increases with socioeconomic status, with the highest turnout occurring among the people with the most education. However, looking within educational attainment levels, Black Georgians often vote at higher rates than White Georgians. Thus, the higher voter turnout among White Georgians may be explained in part by their greater socioeconomic status, which, as I show below, results from racial discrimination.

*Table 1: Voter Turnout by Race and Educational Attainment in 2020 General Election. Data from November 2020 Current Population Survey Voting Supplement.*

	White	Black
LT High School	28.7%	36.2%
High School	57.8%	47.4%
Some College	76.4%	66.3%
Bachelors Degree	73.1%	78.6%
Graduate	85.9%	91.8%
Overall	66.6%	60.9%

*Contemporary and Historical Racial Discrimination in Socioeconomic Status*

Racial discrimination has affected the economic well-being of racial and ethnic minorities, particularly Black people, in Georgia and continues to do so today. Like many southern states, Georgia maintained a system of Jim Crow racial discrimination and segregation that affected all aspects of life, including education and housing, for generations. Georgia authorities continued to fight desegregation even after the U.S. Supreme Court ruled that segregation in public schools was unconstitutional in 1954. A report of the Georgia Senate Research Office characterized the 1956 senate session as focused on upholding segregation, stating:

The legislators of 1956 were so determined and desperate to maintain segregation that they were willing to abandon Georgia's public schools to avoid integration. They also supported a vast array of legislation which maintained segregated state parks, golf courses, swimming pools, and recreation facilities as well as intrastate transportation facilities. And in case any police officer became "confused" about enforcing segregation laws, the General Assembly passed a law revoking the retirement benefits of any law enforcement officer who failed or refused to enforce any segregation law. These legislators, who supported the self-destructive segregation plans in defiance of the U.S. Supreme Court's *Brown* decision, also gave their support to changing the state flag to incorporate the Confederate battle flag (Azarian and Feshhazion 2000: 19).

With respect to the educational system, Georgia operated a system of separate and unequal public schools for Black and White students until well into the 1970s. Even though the U.S. Supreme Court ruled segregated public schools unconstitutional in *Brown v. Board of Education* in 1954, Georgia, like many southern states, adopted the policy of massive resistance to school integration. After the Court decided *Brown* in 1954, Georgia voters approved a constitutional amendment that would disband public schools and instead provide parents with vouchers that could be used to send their children to segregated private schools (Azarian and Feshhazion 2000). The political leadership of Georgia fought integration as well; Governor Griffin vowed to fight desegregation in public schools:

There will be no mixing of the races in the public schools and college classrooms of Georgia anywhere or at any time as long as I am governor....All attempts to mix the races, whether they be in the classrooms, on the playgrounds, in public conveyances or in any other area of close personal contact on terms of equity, peril the mores of the South (Azarian and Feshhazion 2000: 9).

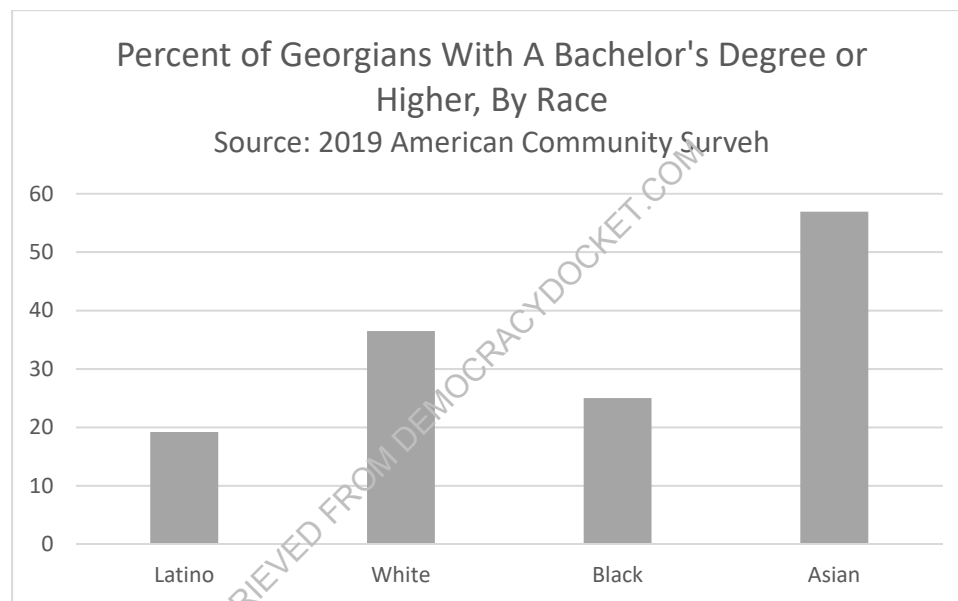
Segregation also reigned at the University of Georgia, which was integrated in 1961 only after a federal judge ordered the university to admit Charlayne Hunter and Hamilton Holmes (2021a).

The resistance of Georgia officials to desegregation meant that Georgia students still attended segregated schools in most counties well into the 1970s. As of 2007, 109 of Georgia's 180 school districts had been involved in litigation involving school desegregation (2007). The United States brought a school desegregation case against the State of Georgia and 81 school districts in 1969 (2017). In 1972, Atlanta's school district was the first to achieve unitary status, which meant that the district had "made the transition" from a segregated to a desegregated system (2007: 3). However, even with the achievement of unitary status, 103 of Atlanta's 150

schools were still segregated (Hornsby Jr 1991: 35).<sup>1</sup> Since then, dozens of Georgia school districts have achieved unitary status, but a majority of those subject to the 1974 consent decree still have not received that designation (2007).

The persistence of *de jure* segregation in Georgia into the 1970s affects socioeconomic equality, and thus political equality, in Georgia to this day. The earliest school age children in 1970, when most of Georgia's schools were still segregated by law, are only 55 years old today. Adults age 55 and older currently make up 36.1% of Georgia's active registered voters (2021m). In other words, more than one-third of Georgia's current electorate was of school age when Georgia still enforced segregation in public schools.<sup>2</sup> Among Black Georgians, adults age 55 and older are 30.8% of active registered voters (2021m).

Figure 2: Percent of Georgians with a Bachelor's Degree or Higher, By Race



<sup>1</sup> School segregation in Atlanta was sustained because of white flight, or the mass exodus of White families from the city and its public schools. As I discuss in the next section, white flight was made possible by a series of federal, state, and local policy decisions about transportation and infrastructure investments, lending, and zoning. In a study of school desegregation in Atlanta, Hornsby, Jr. found, "Since 1960, for example, twenty-four schools had gone from all-white to desegregated to all-black. Whites seemed simply intolerable of any school which became thirty percent or more black. When that 'turning point' was reached, almost all, if not all, whites fled. The school system had no choice but to admit defeat in the face of this phenomenon" (Hornsby Jr 1991: 38). Recognizing the reality that "[t]here 'simply were not enough whites' left 'to go around'", civil rights groups agreed to the Atlanta Compromise of 1973 in which "[t]hey also decided to abandon the idea of mandatory cross-town or cross-jurisdictional busing" (Hornsby Jr 1991: 40).

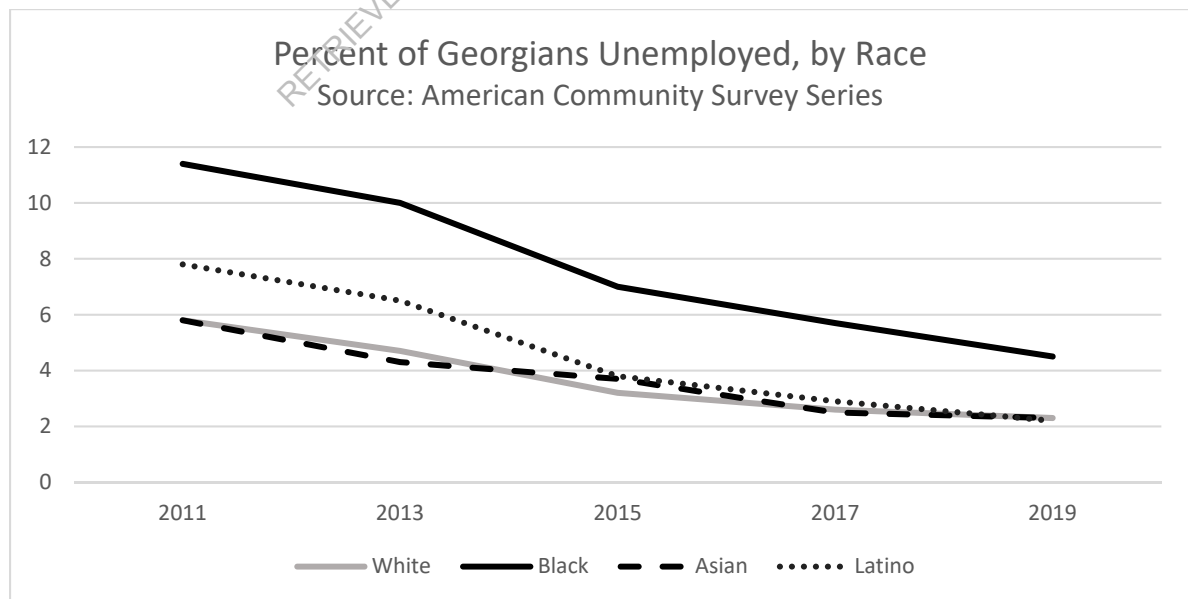
<sup>2</sup> According to the 2019 American Community Survey, 54.4% of Georgia residents were born in Georgia (2020h).



Educational inequality also poses problems for current students. Currently, out of 181 districts, 8 districts in Georgia are more than 90 percent White, while 12 districts are more than 90 percent non-White (2021e). Twenty-five districts are more than 80 percent non-White (2021e). Such segregation can detrimentally affect the academic performance of minority students: Black and Latino students who grew up under conditions of segregation were less academically prepared for college and had been exposed to more violence and social disorder than those coming from “majority-dominant settings.” (Massey and Fischer 2006).

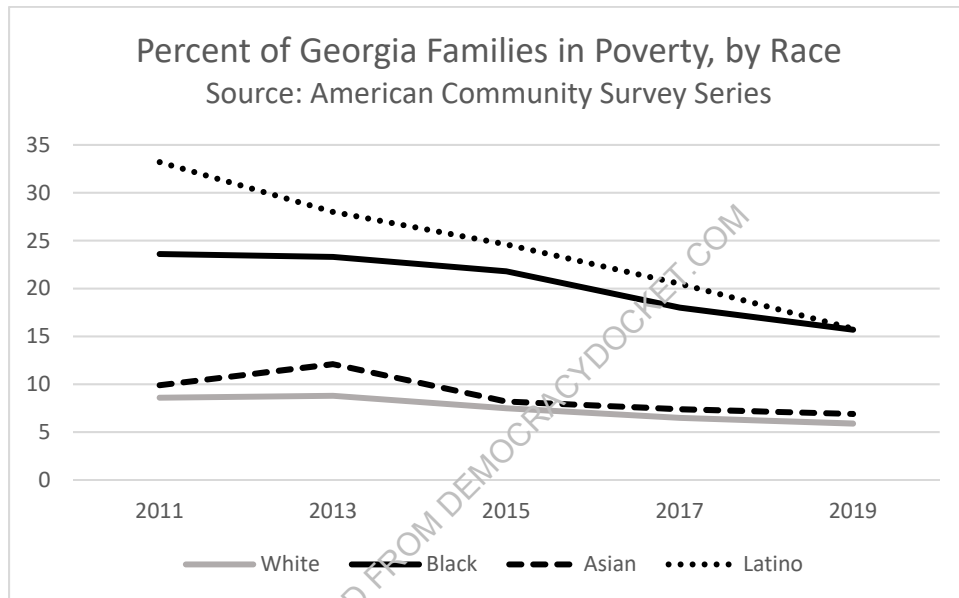
Despite the persistence of segregation, there have been gains in educational attainment, though racial gaps persist. Figure 2 shows data from the 2019 1-Year Estimates from American Community Survey on the percentage of Georgians over the age of 25 who have earned a Bachelor’s degree or higher, by race. The data show that White and Asian Georgia adults are far more likely than Black and Latino adults to have earned a Bachelor’s or postgraduate degree. Racial inequality exists at the elementary and secondary school levels as well. The average reading score for White Georgia public school 8<sup>th</sup> graders was 272, while the average score for Black Georgia public school 8<sup>th</sup> graders was 249 (2019b). The racial gap in reading proficiency is 25 percentage points: 43 percent of White public school 8<sup>th</sup> graders were proficient in reading, while only 18 percent of Black students were proficient (2019b). The gap was not statistically different from that in 1998 (2019b). With respect to mathematics, the racial gap between White and Black Georgia public school 8<sup>th</sup> graders is 30 points; 43 percent of White 8<sup>th</sup> graders are proficient in math, while only 14 percent of black 8<sup>th</sup> graders are proficient (2019a). Black students in Georgia also face harsher discipline at school: Black K-12 students are 65.7 percent of students with one or more out-of-school suspensions (2018). At the preschool level, 60 percent of students who received out-of-school suspensions were Black (2018). School suspensions have been shown to increase subsequent arrests and other anti-social behavior in youth (Mowen and Brent 2016; Hemphill et al. 2006).

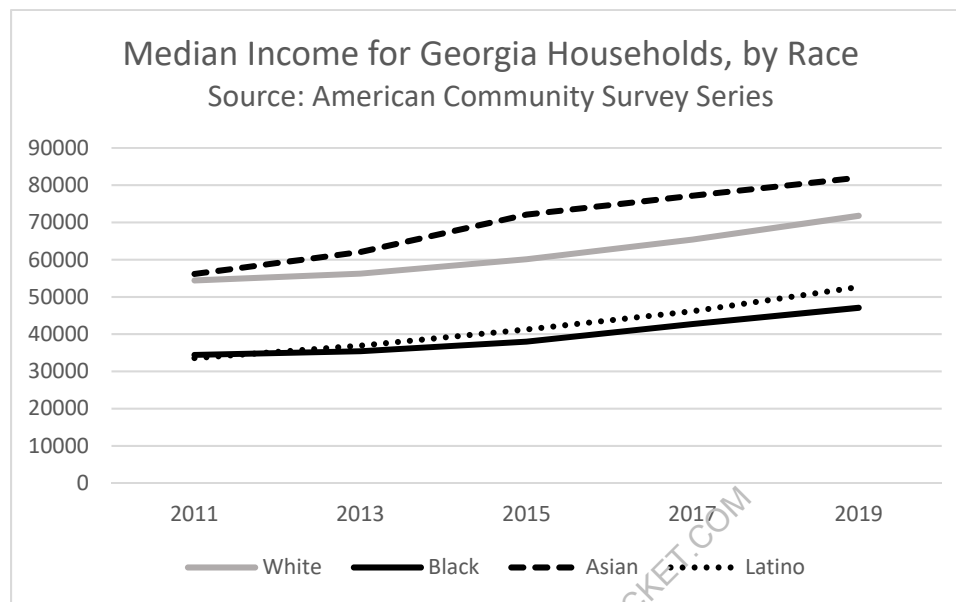
*Figure 3: Percent of Georgians Unemployed, by Race*



There are racial gaps in income, poverty, and employment among Georgians as well. As depicted in Figure 3, data from the 2019 American Community Survey show there are persistent racial gaps in unemployment, with Black Georgians nearly twice as likely to be unemployed than White Georgians. The American Community Survey further shows that gaps in poverty rates, shown in Figure 4, also are large and persist over time: Black and Latino poverty are 2.5 times as high as White poverty in Georgia. The median income for Black Georgia households is about \$25,000 less than that of White Georgia households (Figure 5).

*Figure 4: Percent of Georgia Families in Poverty, by Race*



*Figure 5: Median Income for Georgia Households, by Race*

Some income and employment inequality is related to educational inequality (Long 2010), which, as discussed above, results from historical and contemporary racial discrimination. Racial discrimination can lead to income inequality through other pathways as well. Prisoners in Georgia, who are disproportionately Black, have high rates of unemployment post-release (Looney and Turner 2018). There is also evidence that people of color in Georgia face racial discrimination in employment even in the absence of a criminal background. My analysis of the 2014 Behavioral Risk Factors Surveillance System data (a survey conducted by the Centers for Disease Control)<sup>3</sup> found that 11.9% of Black Georgians reported that they were treated “worse than other races” within the past 12 months at work, compared with 2.5 percent of White and 7.9 percent of Latino Georgians. Research support backs up these claims: audit studies, which hold constant potentially confounding factors in order to isolate the causal effect of race, have consistently found that employers discriminate against racial minorities in hiring (Bertrand and Mullainathan 2004; Pager and Quillian 2005; Quillian et al. 2017). Some of this racial discrimination interacts with criminal background (Pager and Quillian 2005). Data on discrimination filings with the Equal Employment Opportunity Commission show that 21,464 charges of race-based employment discrimination were filed in Georgia between 2010 and 2019 (2020d).

To conclude, socioeconomic factors such as education, income, poverty, and employment have been shown to affect voting. Significant disparities exist between Black and White Georgians along each of these dimensions of economic well-being. Because, as shown by existing research, historical and contemporary discrimination by state and market actors

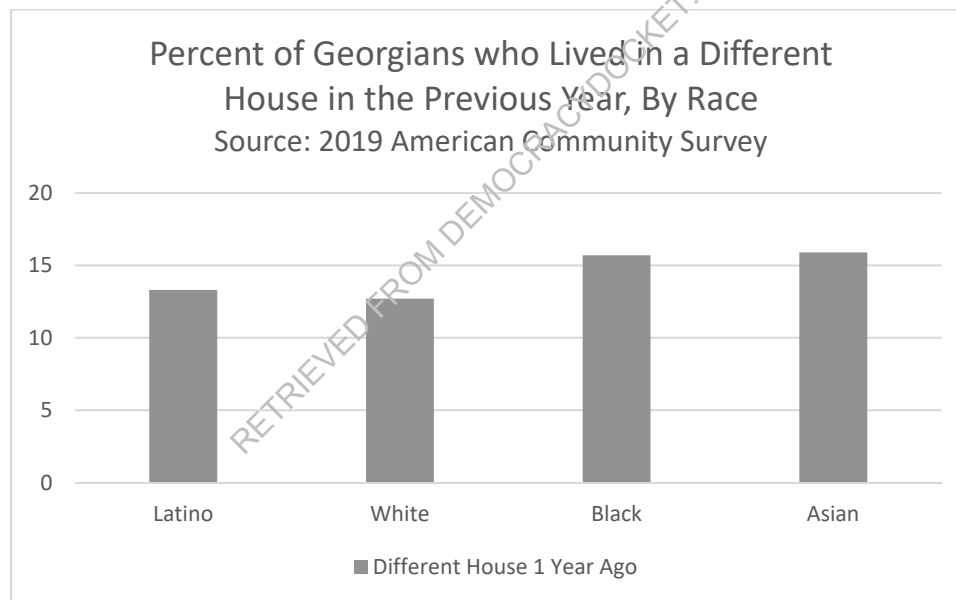
<sup>3</sup> [https://www.cdc.gov/brfss/annual\\_data/annual\\_2014.html](https://www.cdc.gov/brfss/annual_data/annual_2014.html)

contributes to these racial disparities in socioeconomic status, such discrimination also has downstream effects on voting.

### *Race and Residence in Georgia*

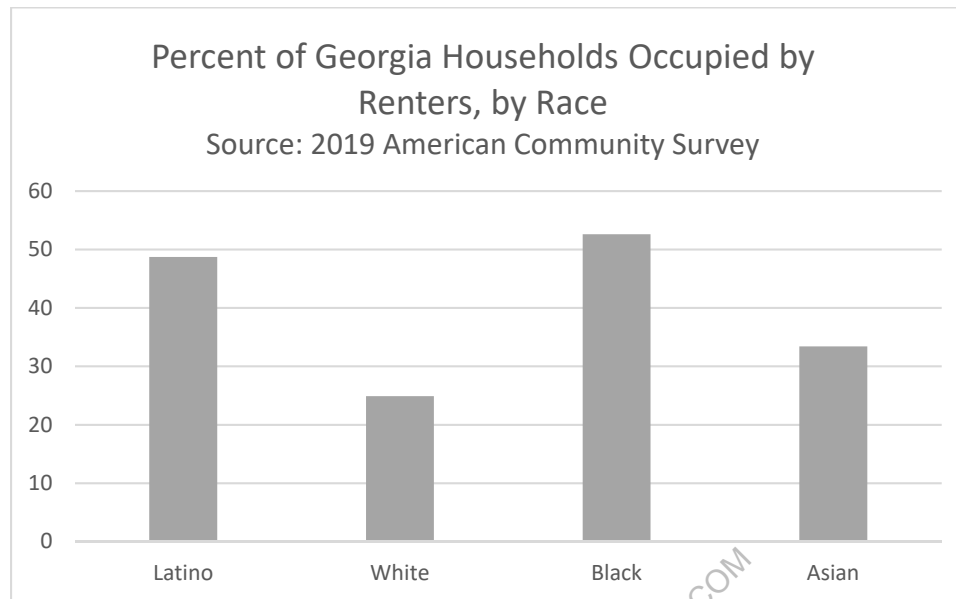
Residence, or where an individual lives, matters for political participation for several reasons. First, residency requirements have been shown to reduce voter registration and turnout, largely because residential mobility increases the administrative burden of maintaining registration (Highton 2000). Second, neighborhood context matters for political mobilization and political outcomes (Burbank 1997; Burch 2013; Cohen and Dawson 1993; Huckfeldt, Plutzer, and Sprague 1993; Huckfeldt 1979; Tam Cho and Rudolph 2008). One particular contextual factor, racial residential segregation, has important effects on politics. Segregation decreases the ability of Black residents to elect representatives who vote in favor of legislation that is favored by them (Ananat and Washington 2009). Segregation has been shown to decrease Black voter turnout; researchers argue that segregated Black areas have less access to public goods such as polling places or transportation that might matter for voting (Zingher and Moore 2019). Segregated localities also are more politically polarized (Trounstein 2016).

*Figure 6: Percent of Georgians who Lived in a Different House in the Previous Year, by Race*



There are racial gaps in residential mobility in Georgia. As shown in Figure 6, Black Georgians are more likely to move in any given year than White Georgians. Renters are more likely to move than homeowners. As Figure 7 shows, based on the 2019 American Community Survey, Black Georgia households are more than twice as likely as White Georgia households to be renters rather than homeowners. Latino householders are almost twice as likely to be renters than White householders. Linking back to the previous section, homeownership also has important effects on wealth accumulation (Grinstein-Weiss et al. 2013; Turner and Luea 2009).

*Figure 7: Percent of Georgia Households Occupied by Renters, by Race*



Residential mobility often is involuntary and due to factors such as evictions and foreclosures. 56,963 evictions took place in Georgia in 2016 (2021f). Research shows that in Fulton County, Georgia, for example, Black or African-American tenants were more likely to experience eviction (Raymond et al. 2018). Foreclosure rates were higher in majority Black and segregated Black neighborhoods in metro Atlanta (Pooley 2015). Forced mobility is a product of racial discrimination: predatory lenders focused subprime mortgage products on minority neighborhoods, and racial residential segregation contributed to the foreclosure crisis (Rugh, Albright, and Massey 2015; Hyra et al. 2013; Rugh and Massey 2010; Wyly et al. 2006).

With respect to neighborhood context, racial residential segregation is an important component of economic and health outcomes. Racial residential segregation increases Black poverty rates, lowers Black educational attainment, and increases income inequality between Black and White residents (Ananat 2011); research attributes these effects to isolation from quality schools and jobs (Kruse 2013; Massey and Fischer 2006; Wilson 1996). Racial residential segregation contributes to the test score gap between Black and White students (Reardon, Kalogrides, and Shores 2019). Racial residential segregation also contributes to inequalities in the provision of public goods and lowers public goods expenditures (Trounstein 2016). Racial residential segregation also has been shown to lead to worse health outcomes and greater exposure to environmental toxins (Ard 2016; Kramer and Hogue 2009).

Racial residential segregation is a persistent feature of several Georgia cities and metropolitan areas. The Othering and Belonging Institute at Berkeley characterized the city of Atlanta as a high segregation city in 2019 (2021h). All of the top 5 metro areas in Georgia--Atlanta-Sandy Springs-Marietta, Savannah, Macon, Columbus, and Augusta-Richmond County--were characterized as high segregation metro areas as well (2021i).

Visually, the residential segregation of Black residents is clear. For example, Figures 8 and 9 depict data from the Decennial Census on the racial composition of census tracts in two



metro Atlanta counties that I understand are relevant to this case—Clayton, and Henry, respectively. It is clear from these maps that Black people tend to live in neighborhoods with high concentrations of other Black people. Maps of Richmond (Figure 10), and Dougherty (Figure 11) Counties (Augusta and Albany, respectively) also show the racial segregation of Black residents.

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Figure 8: Clayton County Census Tracts by Racial Composition

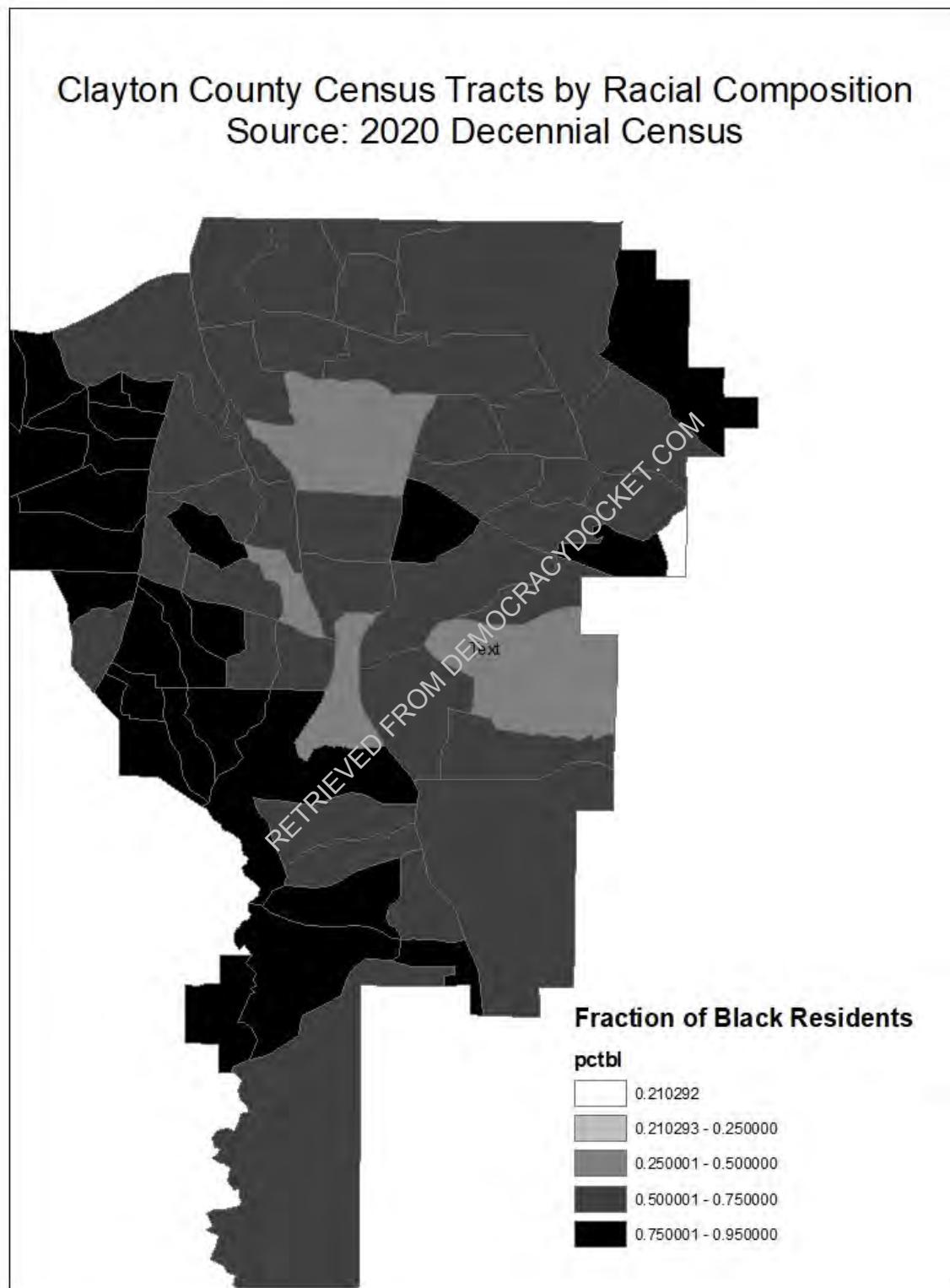


Figure 9: Henry County Census Tracts by Racial Composition

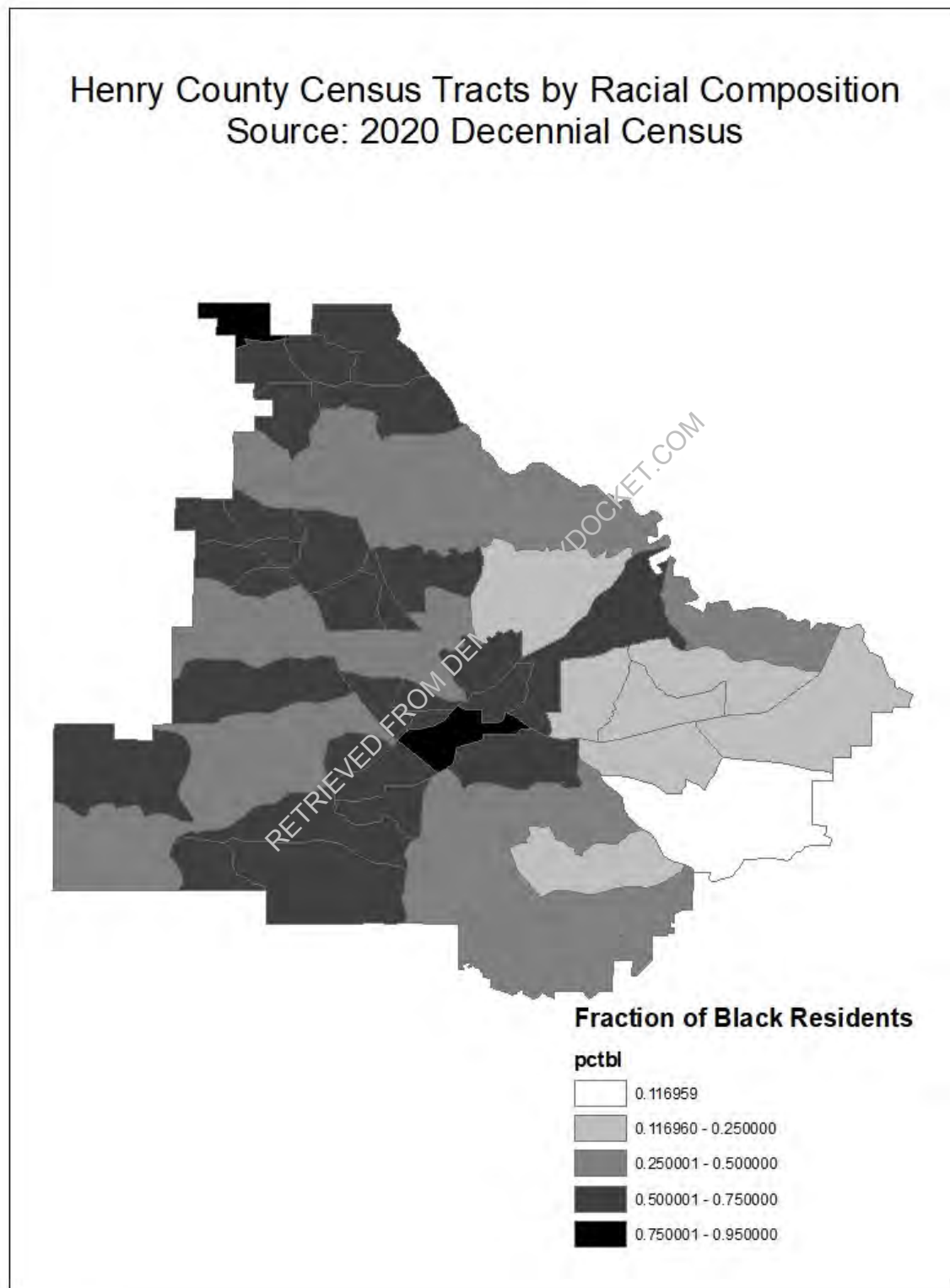
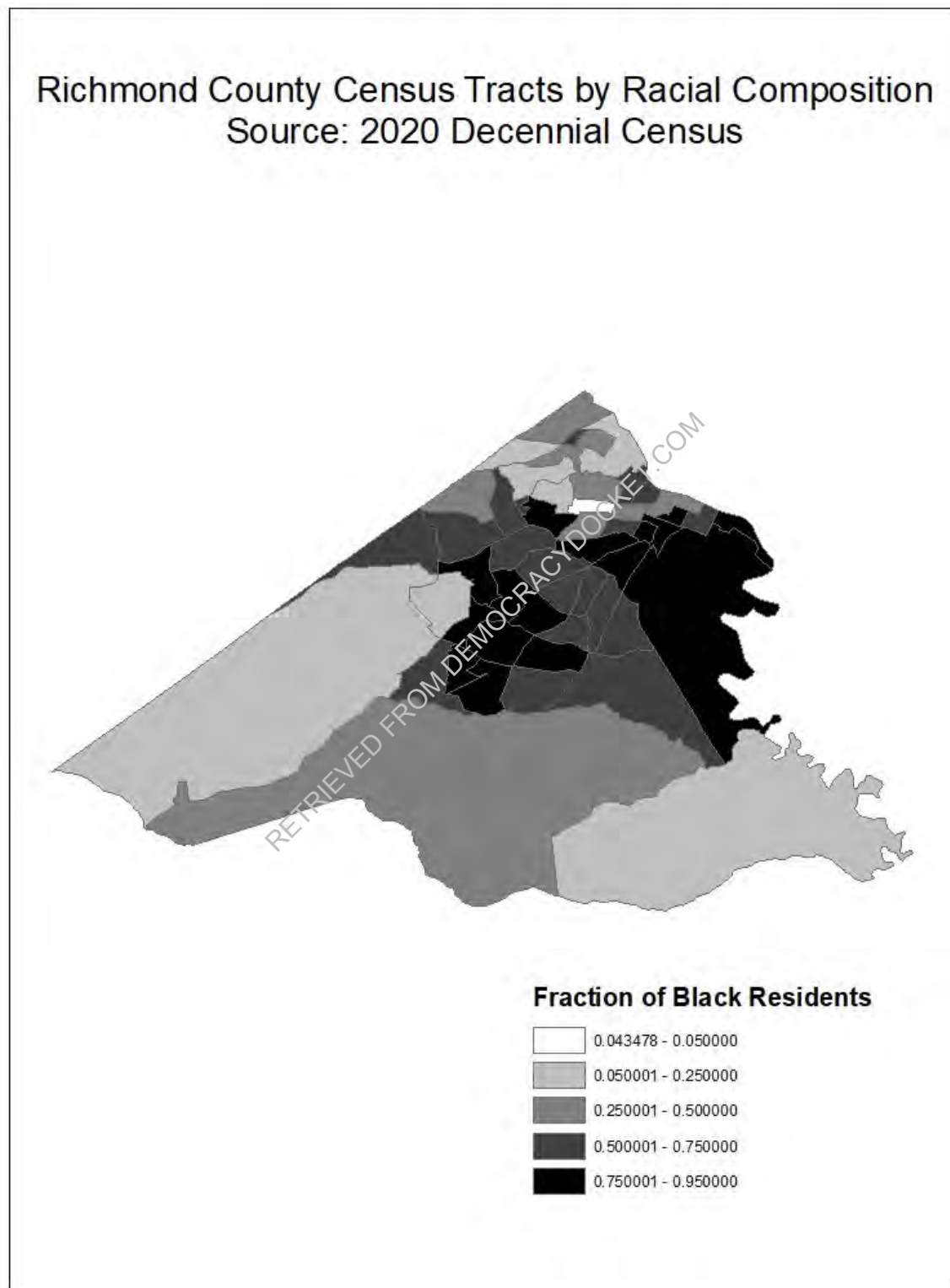
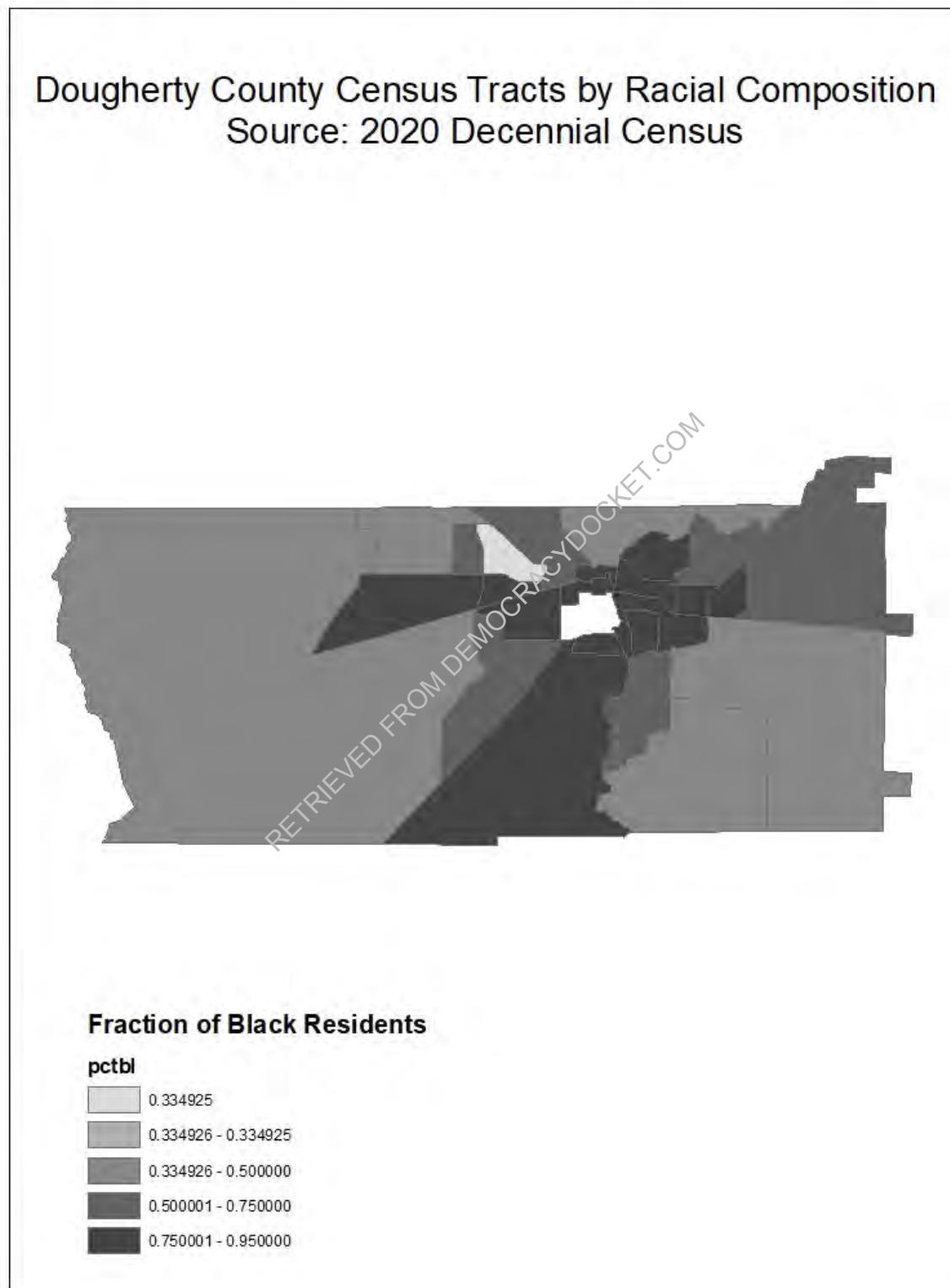


Figure 10: Richmond County Census Tracts by Racial Composition



*Figure 11: Dougherty County Census Tracts by Racial Composition*



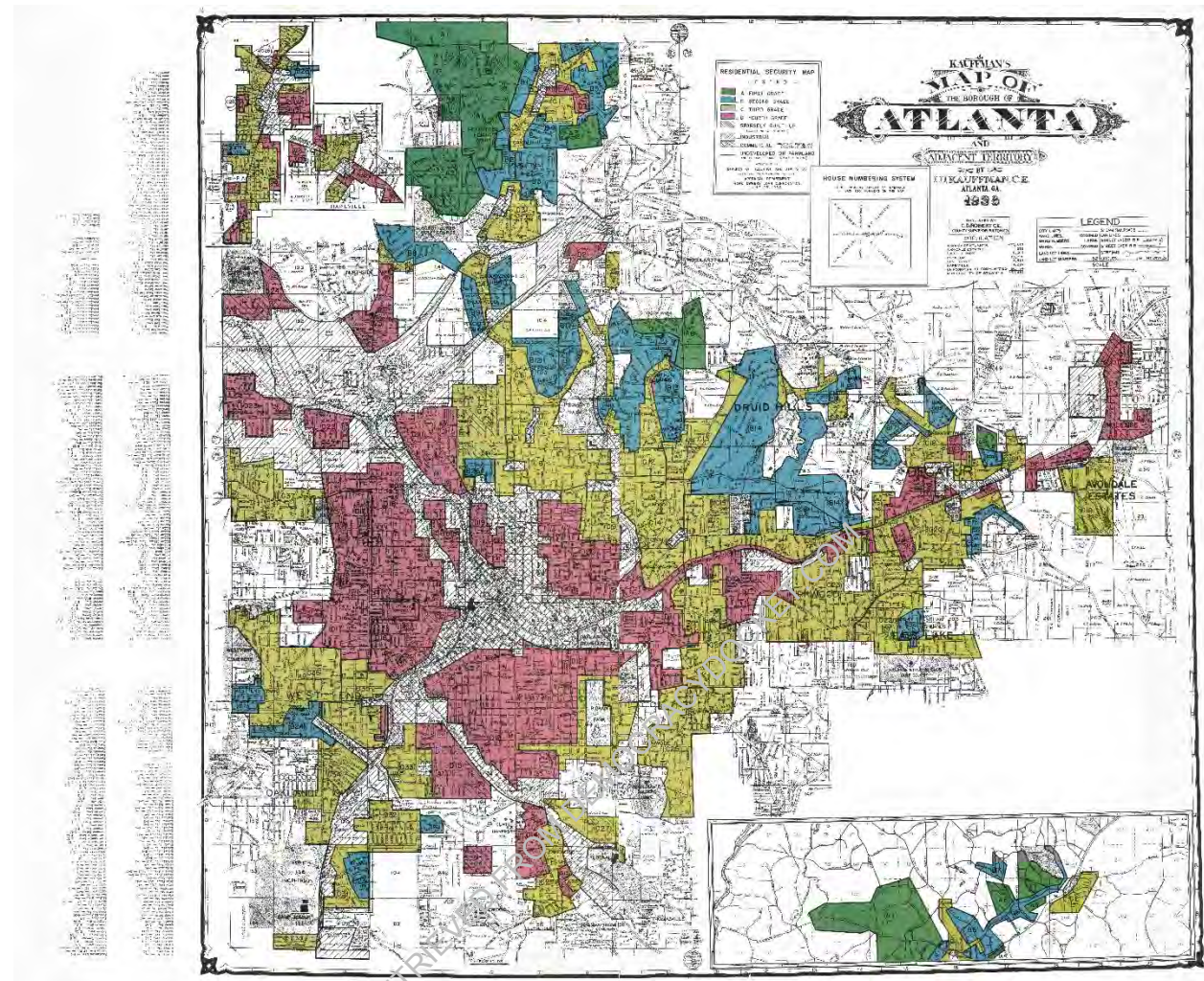


Contemporary patterns of racial residential segregation reflect Georgia's long history of racial discrimination in housing. Of course, racial neighborhood lines were maintained with violence throughout Georgia's history (Kruse 2013: 44-58; 2016). However, racial residential segregation in Georgia also is the result of federal, state, and local policies.

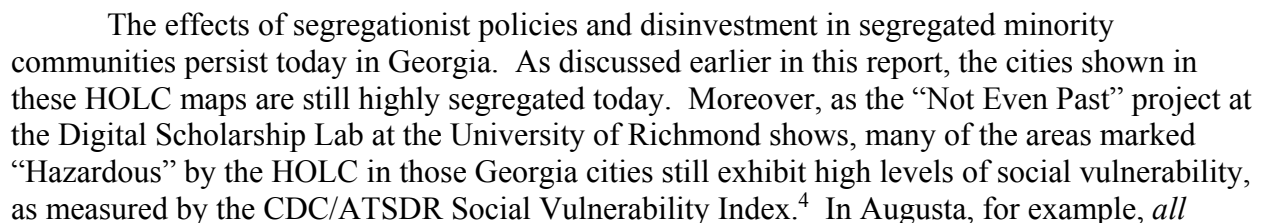
The Federal Housing Administration (FHA) was created in 1934. Its primary task was to "insure lenders against any loss on loans made for purchasing homes" (Kimble 2007: 402). The FHA, in this role, "could dictate the range of acceptable, insurable terms and conditions of home lending" (Kimble 2007: 403). Race was the most important criterion that the FHA used to evaluate "the trajectory of a city and its neighborhoods" (Kimble 2007: 403). Black and racially mixed areas were deemed hazardous for lending; the FHA "instructed financial institutions not to lend to households in integrated or predominantly African American areas" (Kimble 2007: 405). The FHA also encouraged the use of racially restrictive covenants and racial zoning to uphold racial residential segregation (Kimble 2007). The FHA did not officially abandon this policy until 1949 (Kimble 2007).

In order to prevent lending to places where Black people lived, the FHA relied on Residential Security Maps that were produced by the Home Owners Loan Corporation (HOLC). These maps "color-coded neighborhoods using racial composition as a primary indicator of their acceptability as candidates for mortgage investment" (Kimble 2007: 405). The maps assigned grades to neighborhoods based on racial composition, "with 'A' being most desirable and a 'D' grade ensuring rejection" (Kimble 2007: 405). For example, the HOLC maps for Atlanta and Augusta are shown in Figures 12 and 13, respectively. In the maps, hazardous areas are shown in red.

Figure 12: Home Owners Loan Corporation Residential Security Map of Atlanta, GA







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*areas marked hazardous in the 1938 maps have high social vulnerability scores today (2021j).* In Atlanta, a majority of areas marked hazardous in the HOLC maps still have high social vulnerability scores today (2021j).

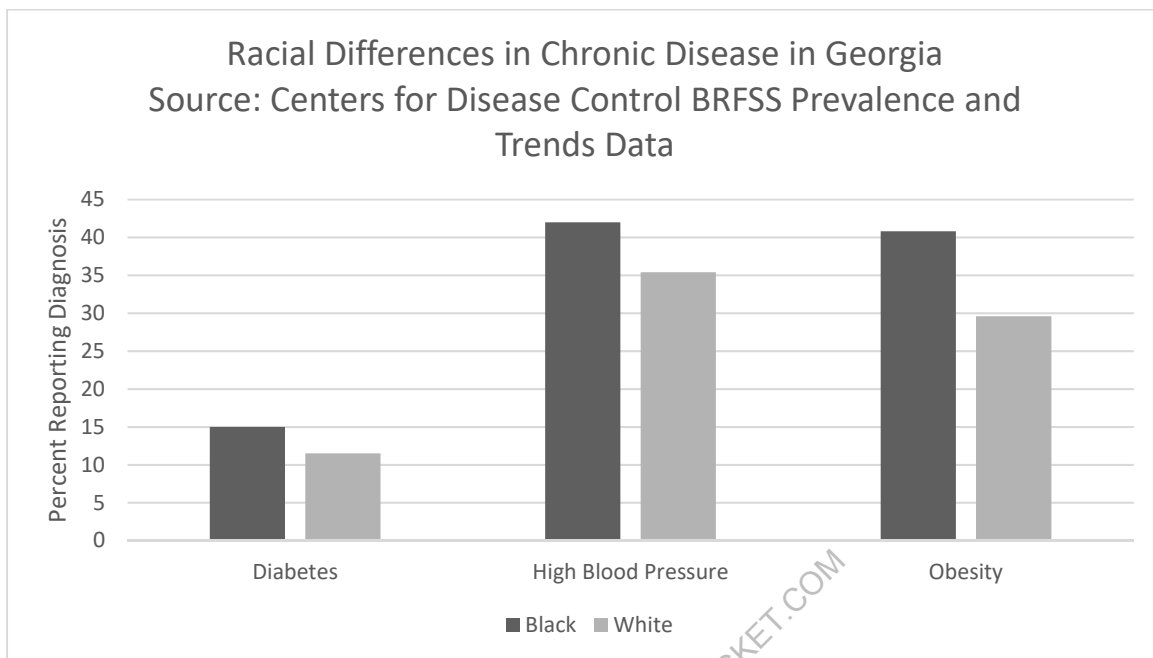
The persistence of racial residential segregation over time in Georgia stems from local and state resistance to desegregation. Attempts to integrate parks, pools, and schools in Atlanta led to white flight and disinvestment in these public accommodations (Kruse 2013). Government tax and transportation policies favored suburbanization, helping to facilitate white flight in response to racial integration (Kruse 2013). For instance, Kruse argues that despite growing traffic congestion, White suburban Atlanta metro voters have consistently rejected the expansion of MARTA, the city's rapid transit system, into their communities because of their desire to maintain racial separation (Kruse 2013: 249). Discrimination in access to capital also shaped residential housing patterns (Thurston 2018). Local land use policies continue to shape racial residential segregation (Trounstein 2020, 2021).

In sum, where a person lives has been shown by researchers to affect voting participation. The evidence shows that racial disparities in residence, particularly related to tenure and segregation, persist in Georgia. The scholarly literature shows that such disparities have been, and continue to be, shaped by public policies that drive public and private investment in neighborhoods and infrastructure. By extension, then, these discriminatory policies also shape voting participation.

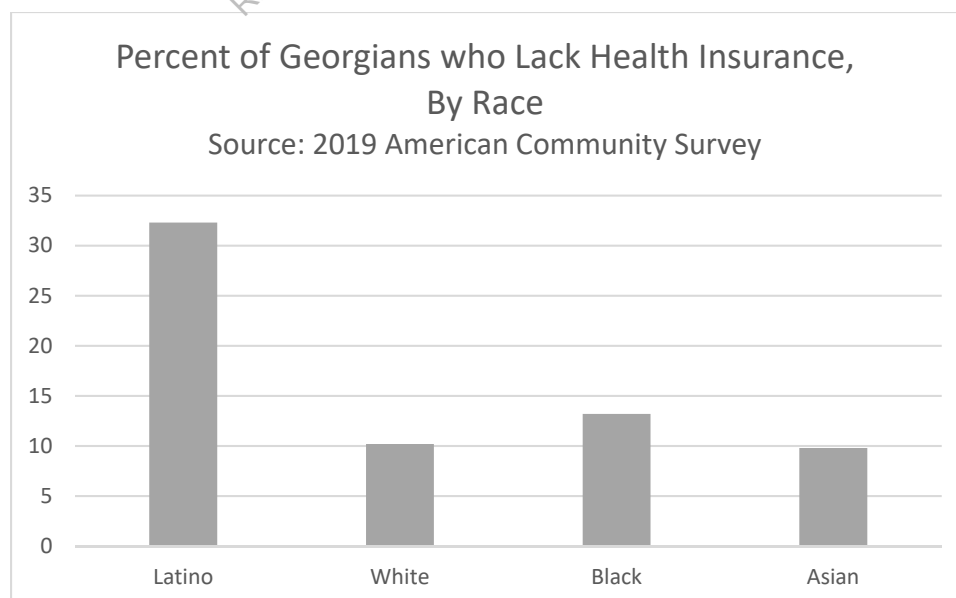
### *Race and Health in Georgia*

Health status also may affect the ability of individuals to overcome the costs of voting (Pacheco and Fletcher 2015). It takes time and money to manage failing health, resources that would not be available for political participation (Pacheco, 2015 #1427). Health conditions also may impair cognitive functioning, especially in old age, and may be a key explanatory factor in the curvilinear relationship between age and voter turnout (Pacheco and Fletcher 2015). Studies have associated poor health with lower voter turnout (Blakely, Kennedy, and Kawachi 2001; Lyon 2021; Pacheco and Fletcher 2015). People with disabilities also are less likely to vote; problems with polling place accessibility partly explain this gap (Schur, Ameri, and Adya 2017; Schur et al. 2002).

Health outcomes vary by race in Georgia, with racial minorities experiencing worse outcomes than White Georgians on a number of dimensions. As shown in Figure 14, in 2019, Black Georgians were more likely to suffer from obesity, high blood pressure, and diabetes than White Georgians (2020b). Infant mortality for Black Georgians, at 11.2 per 100,000 births, is more than twice as high as that for White Georgians, which is 4.9 per 100,000 births (2020e). Death rates overall are higher for Black Georgians (848.0 per 100,000) than White Georgians (782.4 per 100,000) (2020f). The average life expectancy for White Georgians is higher than for Black Georgians: White women are expected to live 1.7 years longer on average than Black women, and White men are expected to live about 3 years longer than Black men, on average (Kaufman, Riddell, and Harper 2019).

*Figure 14: Racial Differences in Chronic Disease in Georgia*

Lack of access to health care, which also can lead to worse outcomes, varies by race in Georgia. In Georgia, 15.5% of Black respondents to a Kaiser Family Foundation survey said that they did not see a doctor because of cost concerns in 2020 compared with 11.2% of White respondents (2020a). Among Georgians, health insurance coverage varies by race, such that, according to the 2019 American Community Survey, 13.2% of Black Georgians report that they have no health coverage, compared with only 10.2% of White Georgians (Figure 15).

*Figure 15: Percent of Georgians who Lack Health Insurance, By Race*

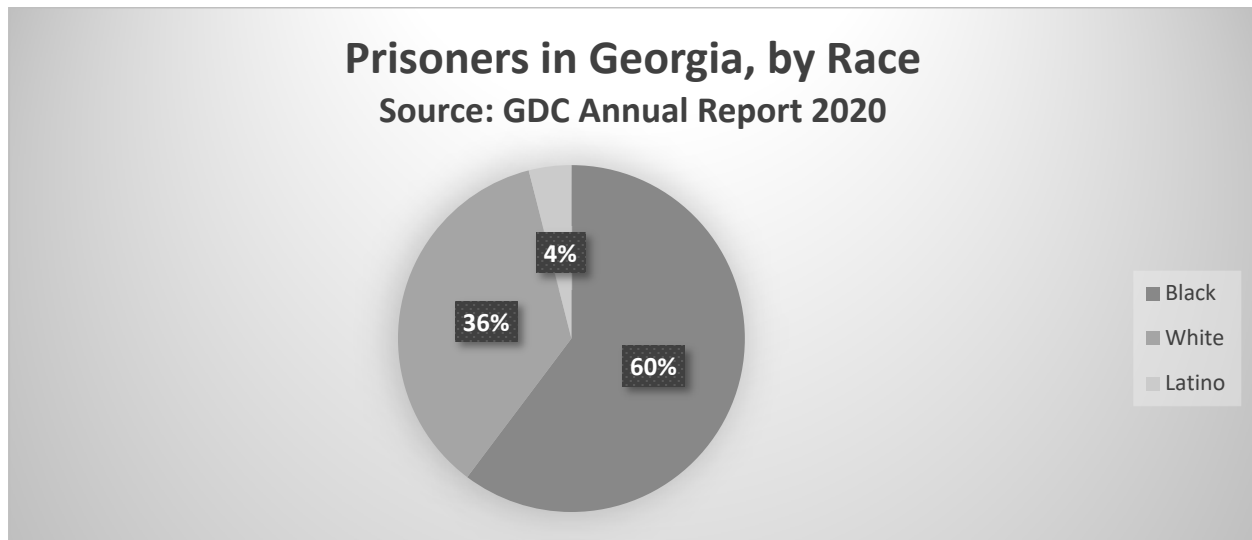
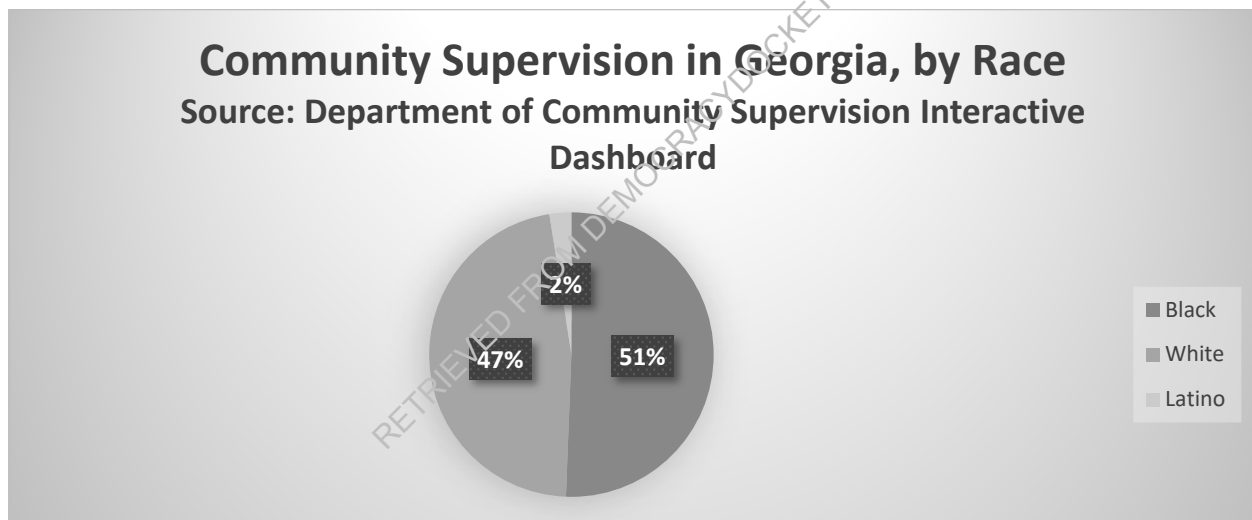


Discrimination contributes to racial health disparities. The experience of discrimination is associated with poor health in Black adolescents in rural counties in Georgia (Brody, Yu, and Beach 2016; Brody et al. 2018). Also, racial residential segregation, which as discussed previously affects several Georgia metropolitan statistical areas, particularly has been shown to lead to worse health outcomes for Black Americans. Several studies have demonstrated that racial residential segregation contributes to racial gaps in cancer outcomes (Landrine et al. 2017; Blanco et al. 2021; Poulson et al. 2021). In particular, researchers have shown that neighborhood racial context and racial residential segregation contribute to worse cancer outcomes for Black Georgians relative to White Georgians (Russell et al. 2011; Johnson et al. 2016). Racial residential segregation in Atlanta and other cities also have been associated with food deserts, which have been shown to lead to worse health outcomes (ROSS and WINDERS 2018; Havewala 2021; Fong et al. 2021). Racial residential segregation also may make it more difficult for Black Americans to access primary care physicians and other doctors (Gaskin et al. 2012; Anderson 2018).

#### *Race and Criminal Justice in Georgia*

Several studies (including my own work) have shown that, for individuals, contact with the criminal justice system, from police stops, to arrest, to incarceration, directly decreases voter turnout (Burch 2011b; Lerman and Weaver 2014; Weaver and Lerman 2010). Primarily, criminal justice contact decreases turnout through “the combined forces of stigma, punishment and exclusion” which impose “barriers to most avenues of influence” and diminish “factors such as civic capacity, governmental trust, individual efficacy, and social connectedness that encourage activity” (Burch 2007: 12). Another important pathway by which criminal justice contact can decrease voter turnout, at least for people with felony convictions, is through felony disenfranchisement laws (Burch 2007).

Contact with the criminal justice system also varies by race in Georgia. Black Georgians make up a disproportionate share of the people incarcerated or on community supervision for felonies. According to the 2019 American Community Survey, 32.9% of Georgia’s population identified as Black, but, as shown in Figures 16 and 17, 60% of Georgia’s prisoners and 51.8 percent of Georgia’s community supervisees are Black (2021c; 2021b). Black Georgians are 50.8% of Georgia’s arrestees (2021d).

*Figure 16: Prisoners in Georgia, by Race**Figure 17: Community Supervision in Georgia, by Race*

The disproportionate impact of Georgia's criminal justice system on Black Georgians has roots in the Reconstruction era. After the Civil War ended, the Georgia Legislature passed Black codes, which were designed to penalize newly freed slaves and control their labor through enticement laws, vagrancy laws, and other schemes (Roback 1984; Cohen 1976). However, Georgia's prison was destroyed during the War, and the state turned to a system of convict leasing to punish wrongdoing (Muller 2018; Mancini 1978). Before the end of the War, very few of Georgia's prisoners were Black (Muller 2018). However, due to legal changes enshrined in the Black Codes, nearly all of Georgia's prisoners were Black by the end of Reconstruction (Muller 2018; Adamson 1983). These prisoners were sentenced to work camps for rail, lumber, and turpentine companies, as well as to chain gangs to build county roads (Mancini 1978; Lichtenstein 1993). Because of the relationship between racially discriminatory laws and the

color of the convict leasing system, this system is “inextricably bound to systemic racial oppression and social and economic disparities between Blacks and Whites” (Whitehouse 2017: 93).

Racial discrimination still is an important contributor to the disproportionate representation of Black Georgians relative to White Georgians in the criminal justice system today. Black Georgians make up a disproportionate share of arrestees (2021d). These racial disparities in arrest are caused partially by factors that make it more likely that police will stop or search Black people, such as spatially differentiated policing, racial residential segregation, and discrimination (Beckett, Nyrop, and Pfingst 2006; Gelman, Fagan, and Kiss 2007; Ousey and Lee 2008; Pierson et al. 2020). Racial disparities also exist in bail decisions (Arnold, Dobbie, and Yang 2018) and in sentencing (Bushway and Piehl 2001; Mitchell 2005; Steffensmeier and Demuth 2000; Steffensmeier, Ulmer, and Kramer 1998). Studies have shown that racial sentencing disparities are associated with capital sentencing and sentencing for other types of cases in Georgia state courts (1987; Burch 2015).

In Georgia, people who are serving an active sentence in prison or in the community (i.e., on parole or probation) for a felony conviction cannot vote (Uggen et al. 2020). Because of the disproportionate involvement of Black Georgians with the criminal justice system, Black Georgians are more likely to have lost their voting rights because of a felony conviction relative to White Georgians (Burch 2011a). An estimated 6.27% of Georgia’s Black voting age population cannot vote due to a felony conviction, compared with 3.79% of Georgia’s population overall (Uggen et al. 2020). This figure translates to 145,601 disenfranchised Black Georgians who were not able to vote in 2020 (Uggen et al. 2020).

Racial disparities in incarceration also affect the voting participation of the broader community. Because incarcerated individuals tend to come from a relatively small number neighborhoods in Georgia, certain racially segregated areas in the state may have extremely high local incarceration and disenfranchisement rates (Burch 2013). In the highest incarceration block groups in Georgia, imprisonment rates reached a maximum of 14.3% of residents (Burch 2013: 50). Mapping imprisonment to block groups by race in Atlanta shows that a majority of prisoners from Atlanta come predominantly from Black neighborhoods (Burch 2013: 58).

Living in high incarceration neighborhoods can affect individual voter turnout through many mechanisms, even among people who are not convicted and disenfranchised themselves. First, because “children and newcomers learn the community’s participatory values as they observe ample instances of engagement among their family members and peers,” neighborhoods that have fewer voters as role models may fail to transmit norms of participation effectively even to enfranchised residents and future voters (Campbell et al. 1960; Tam-Cho, Gimpel, and Dyck 2006). Second, spouses of convicted offenders also miss out on the participatory effects of having a partner that votes (Campbell et al. 1960; Straits 1990).

There are other political effects: in communities with disenfranchisement laws, convictions reduce the number of voters, which can reduce the political power of a community. This reduction happens first by removing the disenfranchised from the voter rolls. Concentrated incarceration also damages the formal and informal mechanisms of voter mobilization. Political parties tend to concentrate their efforts in places where mobilization is more effective and often fail to mobilize communities with fewer voters (Huckfeldt and Sprague 1992; Rosenstone and Hansen 1993). There are fewer voters available to serve as discussion partners in high-conviction neighborhoods,

a factor that also influences turnout (Huckfeldt and Sprague 1987). In other words, living in high incarceration neighborhoods can decrease voter participation through several mechanisms even for people who have not been convicted of crimes themselves.

### Responsiveness of Elected Officials

Under Section 2 of the Voting Rights Act, courts may consider additional factors, such as whether there is a lack of responsiveness on the part of elected officials to the particularized needs of minority group members. The longstanding and persistent gaps in socioeconomic status, incarceration, and health discussed throughout this report demonstrate the lack of responsiveness of public officials to the needs of Georgia's minority communities. Research has shown that public policies are important for creating and sustaining racial disparities. For instance, as described earlier in this report, persistent test score gaps and educational segregation continue to pose problems for Georgia students; however, Georgia ranks 43<sup>rd</sup> in per pupil expenditures for public elementary and secondary schools (2021l). Black Georgians have worse health outcomes, are less likely to have health insurance, and are more likely to avoid care because of costs, and yet Georgia has not accepted the federal Medicaid expansion (2021k). Felony disenfranchisement disproportionately prevents voting among Black Georgians, yet Republicans decided not to consider changing the law ever after a bipartisan Georgia Senate panel studied the possibility of reinstating some voting rights (Prabhu 2021).

Consistent with these policy choices, public opinion reflects the fact that Georgia's racial minorities do not believe that public officials in Georgia are governing in ways that suit their needs. Black Georgians are less satisfied with their public officials, the direction of the state, and the quality of services they receive than are White Georgians. There is a large racial gap in overall evaluations of Georgia's government and public officials. A survey conducted by the Atlanta Journal-Constitution in January of 2020 found that among White Georgians, 74.9% were very or somewhat satisfied "with the way things are going in Georgia," compared with only 44.4% of Black Georgians and 51.6% of people from other racial groups (2020g). That same survey found a 37.6 percentage point gap in approval of Governor Brian Kemp between White and Black Georgians and a 16.1 percentage point gap in approval of the Georgia General Assembly between White and Black Georgians (2020g). Black respondents to the 2018 Cooperative Congressional Election Survey from Georgia also report lower satisfaction with the quality of local services they receive: on a scale of 1 (excellent) to 5 (poor), Black Georgians rate their police and roads worse on average (police mean score=2.87; roads mean score = 3.12) than White Georgians (police mean score = 2.44; roads mean score = 2.93). Public officials also frequently pass legislation of which Black Georgia voters disapprove. For instance, 65% of Black Georgians disapproved of the passage of SB 202, which enacted several changes to voting laws in Georgia (2021g). Two-thirds of Black Georgia voters said that the law would somewhat (20%) or greatly (47%) decrease their confidence in Georgia's election system (2021g). Seventy percent of Black Georgians believed that the law was passed to make it more difficult for certain groups to vote, rather than to increase voter confidence (2021g).

### The Black Belt in Georgia

Additionally, I was asked by the attorneys in this case to discuss the meaning of the term “Black Belt” as discussed by social scientists. The term “Black belt” is commonly used in political science to refer to political units “in which Negroes constitute a substantial proportion of the population” (Key 1949: 5). Typically, with respect to the American South, the Black Belt refers to a swath of counties across southeastern states in which more than 50% of the population is Black (Webster and Bowman 2008). Historically, these counties have been associated with antebellum slavery and plantation agriculture (Acharya, Blackwell, and Sen 2016: 622). The local prevalence of slavery in the antebellum period still is correlated with high concentrations of Black population today (Acharya, Blackwell, and Sen 2016: 628). Figure 18 shows a map of enslaved population prevalence in southeastern counties from 1860. Figure 19 shows a map of the Black proportion of the population in southeastern counties in 1940. Figure 20 shows a map of the Black proportion of the population in Georgia counties from the 2020 decennial census. In all the maps, Georgia historically has a swath of majority Black counties running diagonally across the middle of the state from Northeast to Southwest.<sup>5</sup>

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<sup>5</sup> Based on the 2020 decennial census counts, there are 21 Georgia counties in which more than 50% of the population identifies as Black: Dougherty, Clayton, Hancock, Calhoun, Terrell, Randolph, Macon, Warren, Rockdale, Clay, Richmond, Bibb, Talbot, Washington, Taliaferro, Early, Sumter, DeKalb, Jefferson, Dooley, and Henry.



*Figure 18: Proportion Slave in 1860 by County. Reproduced from (Acharya, Blackwell, and Sen 2016: 623).*

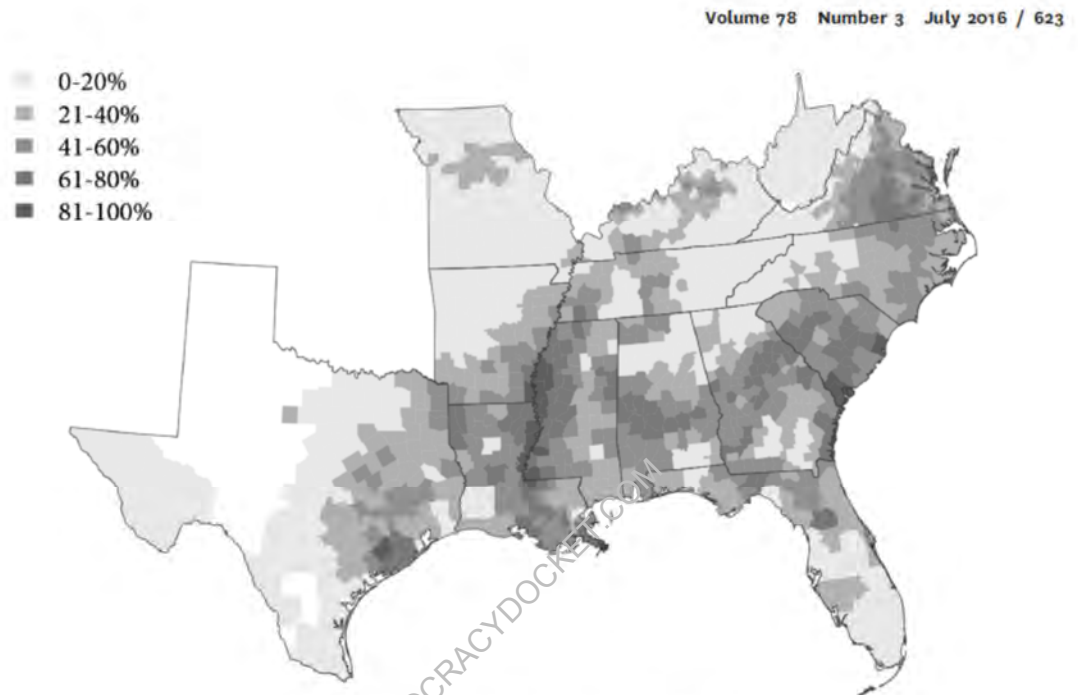


Figure 1. Estimated proportion slave in 1860 by county

Figure 19: Counties with at least 50% Black Population in 1940. Reproduced from (Key 1949: 5).

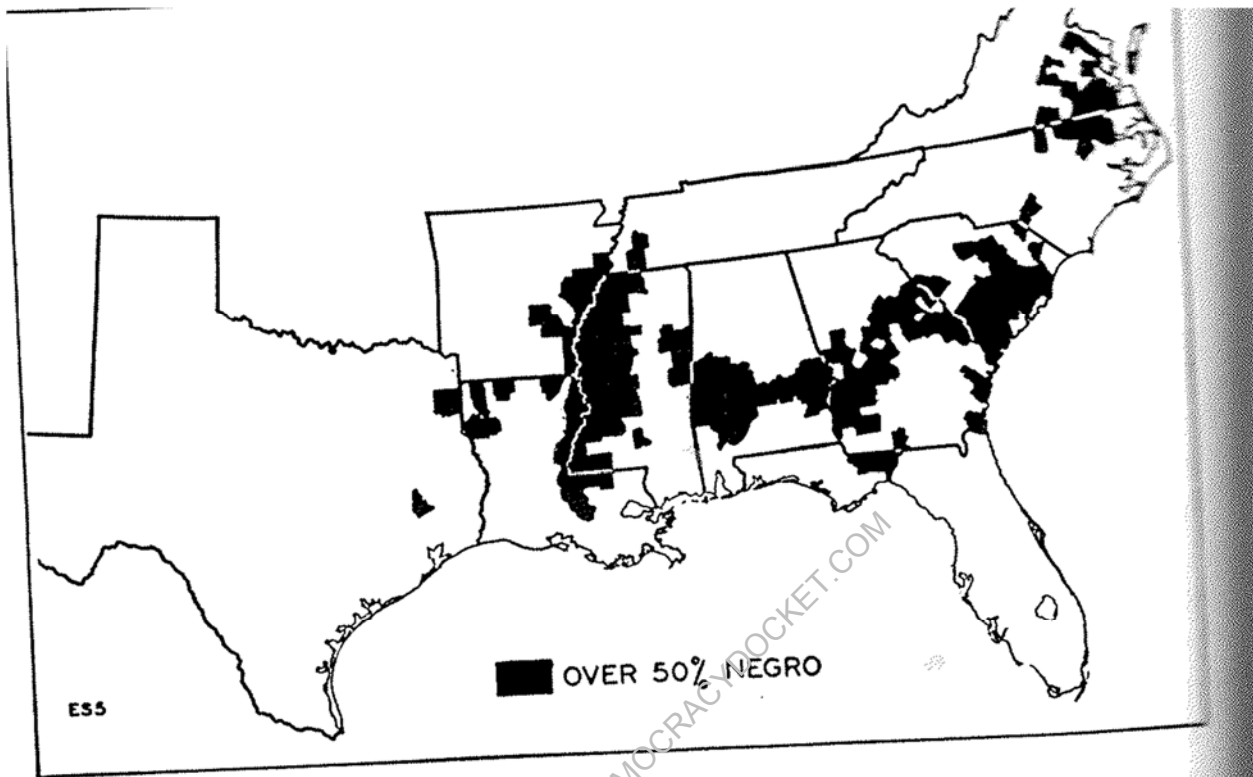
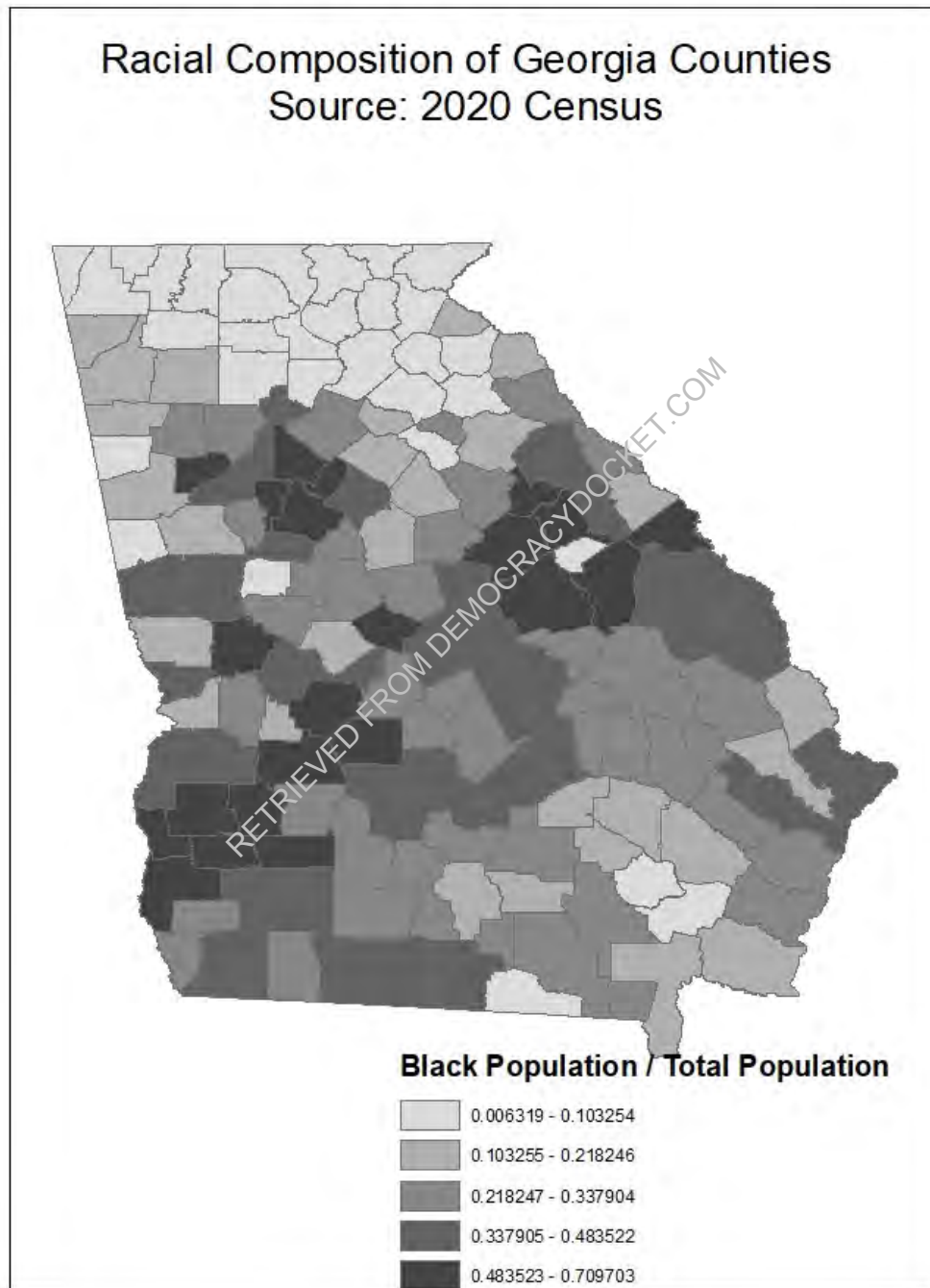


FIGURE 1

Bedrock of Southern Solidarity: Counties of the South with 50 Per Cent or More  
Negro Population, 1940

Figure 20: Racial Composition of Georgia Counties. Source: author's calculations from 2020 decennial census.



Politically, Black belts are distinctive because, according to V.O. Key, in them politics is characterized by the fundamental governance problem posed by “a small white minority” trying to control a majority Black population. In studying the politics of the American South, Key found that “Everywhere the plantation counties were most intense in their opposition to Negro voting; they raised a deafening hue and cry about the dangers to white supremacy implicit in a Negro balance of power” (Key 1949: 8). Key and other observers have found that attitudes of racial domination are distinctive among White people who live in Black belt areas (Glaser 1994; Key 1949). Contemporary analyses continue to find that living in Black belt areas with these legacies of slavery predict white partisan identification and racial attitudes (Acharya, Blackwell, and Sen 2016).

I declare under penalty of perjury that the foregoing is true and correct.

Executed on: January 3, 2022

A handwritten signature in black ink, appearing to read "Traci Burch". The signature is written in a cursive, flowing style. It is positioned above the printed name "Dr. Traci Burch".

Dr. Traci Burch

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# APPENDIX

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## Traci Burch

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### Employment

- Associate Professor, Northwestern University Department of Political Science (2014-Present)
- Research Professor, American Bar Foundation (2007- Present)
- Assistant Professor, Northwestern University Department of Political Science (2007-2014)

### Education

- *Harvard University*

Ph.D. in Government and Social Policy

Dissertation: *Punishment and Participation: How Criminal Convictions Threaten American Democracy*

Committee: Jennifer Hochschild (Chair), Sidney Verba, and Gary King

- *Princeton University*

A.B. in Politics, *magna cum laude*

### Publications

- Burch, Traci. 2021. "Not All Black Lives Matter: Officer-Involved Deaths and the Role of Victim Characteristics in Shaping Political Interest and Voter Turnout." *Perspectives on Politics*.
- Kay Lehman Schlozman, Philip Edward Jones, Hye Young You, Traci Burch, Sidney Verba, Henry E. Brady. 2018. "Organizations and the Democratic Representation of Interests: What Happens When Those Organizations Have No Members?" *Perspectives on Politics*.
- Burch, Traci. 2016. "Political Equality and the Criminal Justice System." In Resources, Engagement, and Recruitment. Casey Klofstad, ed. Philadelphia: Temple University Press.
- Burch, Traci. 2016. "Review of The First Civil Right by Naomi Murakawa." *The Forum*.
- Kay Lehman Schlozman, Philip Edward Jones, Hye Young You, Traci Burch, Sidney Verba, Henry E. Brady. 2015. "Louder Chorus – Same Accent: The Representation of Interests in Pressure Politics, 1981-2011." In Darren Halpin, David Lowery, Virginia Gray, eds. The Organization Ecology of Interest Communities. New York: Palgrave Macmillan.

- Burch, Traci. 2015. "Skin Color and the Criminal Justice System: Beyond Black-White Disparities in Criminal Sentencing." *Journal of Empirical Legal Studies* 12(3): 395-420.
- Burch, Traci. 2014. "The Old Jim Crow: Racial Residential Segregation and Neighborhood Imprisonment." *Law & Policy* 36(3) 223-255.
- Burch, Traci. 2014. "The Effects of Imprisonment and Community Supervision on Political Participation." Detaining Democracy Special Issue. *The Annals of the American Academy of Political and Social Science* 651 (1) 184-201.
- Burch, Traci. 2013. Trading Democracy for Justice: Criminal Convictions and the Decline of Neighborhood Political Participation. Chicago: University of Chicago Press.
- Hochschild, Jennifer, Vesla Weaver, and Traci Burch. 2012. Transforming the American Racial Order. Princeton: Princeton University Press.
- Schlozman, Kay Lehman, Sidney Verba, Henry Brady, Traci Burch, and Phillip Jones. 2012. "Who Sings in the Heavenly Chorus? The Shape of the Organized Interest System." In Schlozman, Kay Lehman, Sidney Verba, and Henry Brady, The Unheavenly Chorus, Princeton: Princeton University Press.
- Schlozman, Kay Lehman, Sidney Verba, Henry Brady, Phillip Jones, and Traci Burch. 2012. "Political Voice through Organized Interest Activity." In Schlozman, Kay Lehman, Sidney Verba, and Henry Brady, The Unheavenly Chorus, Princeton: Princeton University Press.
- Burch, Traci. 2012. "Did Disfranchisement Laws Help Elect President Bush? New Evidence on the Turnout and Party Registration of Florida's Ex-Felons." *Political Behavior* 34 (1); 1-26.
- Burch, Traci. 2011. "Turnout and Party Registration among Criminal Offenders in the 2008 General Election." *Law and Society Review* 45(3): 699-730.
- Burch, Traci. 2011. "Fixing the Broken System of Financial Sanctions." *Criminology and Public Policy* 10(3).
- Hochschild, Jennifer; Vesla Weaver, and Traci Burch. 2011. "Destabilizing the American Racial Order." *Daedalus* 140; 151-165.
- Burch, Traci. 2009. "Can the New Commander-In-Chief Sustain His All Volunteer Standing Army?" *The Dubois Review on Race* 6(1).
- Burch, Traci. 2009. "Review of *Imprisoning Communities*, by Todd Clear." *Law and Society Review* 43(3) 716-18.

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- Schlozman, Kay Lehman and Traci Burch. 2009. “Political Voice in an Age of Inequality,” in America at Risk: Threats to Liberal Self-Government in an Age of Uncertainty, ed. Robert Faulkner and Susan Shell (Ann Arbor: University of Michigan Press).
- Hochschild, Jennifer and Traci Burch. 2007. “Contingent Public Policies and the Stability of Racial Hierarchy: Lessons from Immigration and Census Policy,” in Political Contingency: Studying the Unexpected, the Accidental, and the Unforeseen, ed. Ian Shapiro and Sonu Bedi (New York: NYU Press).

### **Grants**

- Co-Principal Investigator. “Fellowship and Mentoring Program on Law and Inequality.” September 1, 2020 to August 31, 2023. \$349,313. National Science Foundation.

### **Honors and Fellowships**

- American Political Science Association 2014 Ralph J. Bunche Award (for Trading Democracy for Justice).
- American Political Science Association Urban Section 2014 Best Book Award (for Trading Democracy for Justice).
- American Political Science Association Law and Courts Section 2014 C. Herman Pritchett Award (for Trading Democracy for Justice).
- Research grant, Stanford University Center for Poverty and Inequality (2012).
- American Political Science Association E. E. Schattschneider Award for the best doctoral dissertation in the field of American Government (2009)
- American Political Science Association William Anderson Award for the best doctoral dissertation in the field of state and local politics, federalism, or intergovernmental relations (2008)
- American Political Science Association Urban Section Best Dissertation in Urban Politics Award (2008)
- Harvard University Robert Noxon Toppan Prize for the best dissertation in political science (2007)



- Institute for Quantitative Social Sciences Research Fellowship (2006-07)
- *European Network on Inequality* Fellowship (2005)
- Research Fellowship, The Sentencing Project (2005)
- Doctoral Fellow, Malcolm Weiner Center for Inequality and Social Policy (2004-07)

#### **Professional Service**

- APSA Law and Courts Section Best Paper Award Committee (2020-2021)
- APSA Elections, Public Opinion, and Voting Behavior Executive Committee (2020-2023)
- General Social Survey Board of Overseers (2020-2025)
- APSA Kammerer Prize Committee (2017)
- Associate Editor, *Political Behavior* (2015-2019)
- APSA Law and Courts Section, Lifetime Achievement Award Prize Committee (2014-2015)
- Law and Society Association, Kalven Prize Committee (2013-2014)
- American Political Science Association, Urban Politics Section Dissertation Prize Committee (2012-13)
- American Political Science Association, Urban Politics Section Executive Committee (2012-13)
- Law and Society Association Diversity Committee, (2012-2013)
- American Political Science Association, Urban Politics Section Program Co-Chair (2011)
- Associate Editor, *Law and Social Inquiry*
- American Political Science Association, Urban Politics Section Book Prize Committee (2009)
- Reviewer for *The American Political Science Review*, *Public Opinion Quarterly*, *American Politics Research*, and *Time-Sharing Experiments in the Social Sciences*.

#### **Presentations and Invited Talks**

- University of Pennsylvania. Virtual. “Voice and Representation in American Politics.” April 2021.
- University of Michigan. Virtual. “Which Lives Matter? Factors Affecting Mobilization in Response to Officer-Involved Killings.” February 2021.
- University of Pittsburgh. Virtual. “Policing and Participation.” November 2020.
- Hamilton College Constitution Day Seminar. Virtual. “Racial Protests and the Constitution.” September 2020.
- New York Fellows of the American Bar Foundation. New York, NY. “Police Shootings and Political Participation.” March 2020.
- Pennsylvania State University, State College, PA. “Effect of Officer Involved Killings on Protest. November 2019.
- Princeton University. Princeton NJ. “Effects of Police Shootings on Protest among Young Blacks.” November 2019.
- Missouri Fellows of the American Bar Foundation. Branson, MO. Police Shootings and Political Participation in Chicago. September 2019.
- Northwestern University. “Police Shootings and Political Participation.” November, 2018.
- Princeton University. Princeton, NJ. “Police Shootings and Political Participation.” September, 2018.
- University of California at Los Angeles. Los Angeles, CA. “Police Shootings and Political Participation.” August, 2018.
- American Bar Association Annual Meeting. Chicago, IL. “Police Shootings and Political Participation.” August 2018.
- American Bar Endowment Annual Meeting. Lexington, KY. “Effects of Police Shooting in Chicago on Political Participation.” June 2018.
- Vanderbilt University. “Effects of Police Shootings in Chicago on Political Participation.” April 2018.
- Washington University in St. Louis. “Effects of Pedestrian and Auto Stops on Voter Turnout in St. Louis.” February 2018.
- Fellows of the American Bar Foundation, Los Angeles. “Assaulting Democracy.” January

2018.

- Northwestern University Reviving American Democracy Conference. Panel presentation. “Barriers to Voting.” January 2018.
- University of Illinois at Chicago. “Effects of Police Shootings in Chicago on Political Participation.” October, 2017.
- Chico State University. “Constitution Day Address: Policing and Political Participation.” September, 2017.
- Fellows of the American Bar Foundation, Atlanta, Georgia. “Policing in Georgia.” May 2017.
- United States Commission on Civil Rights. Testimony. “Collateral Consequences of Mass Incarceration.” May 2017.
- Northwestern University Pritzker School of Law. “Effects of Police Stops of Cars and Pedestrians on Voter Turnout in St. Louis.” April 2017.
- University of California at Los Angeles. Race and Ethnic Politics Workshop. “Effects of Police Stops of Cars and Pedestrians on Voter Turnout in St. Louis.” March 2017.
- University of North Carolina at Chapel Hill. American Politics Workshop. “Effects of Police Stops of Cars and Pedestrians on Voter Turnout in St. Louis.” February 2017.
- National Bar Association, St. Louis MO. “Political Effects of Mass Incarceration.” July 2016.
- Harvard University, Edmond J. Safra Center for Ethics. Inequalities/Equalities in Cities Workshop. April 2016.
- American Political Science Association Annual Meeting. September 2015. “Responsibility for Racial Justice.” Discussant.
- St. Olaf College. April 2015. “The Collateral Consequences of Mass Incarceration.”
- Northwestern University. Institute for Policy Research. February 2015. “The Civic Culture Structure.”
- Texas A&M University. Race, Ethnicity, and Politics Workshop. September 2014. “Trading Democracy for Justice.”
- Columbia University Teachers College. The Suburban Promise of Brown Conference.

May 2014. “Can We All Get Along, Revisited: Racial Attitudes, the Tolerance for Diversity, and the Prospects for Integration in the 21<sup>st</sup> Century.”

- University of Kentucky. Reversing Trajectories: Incarceration, Violence, and Political Consequences Conference. April 2014. “Trading Democracy for Justice.”
- University of Chicago. American Politics Workshop. March 2014. “How Geographic Differences in Neighborhood Civic Capacity Affect Voter Turnout.”
- Kennedy School of Government, Harvard University. February 2014. “Trading Democracy for Justice.”
- University of Michigan. American Politics Workshop. December 2013. “Trading Democracy for Justice.”
- Yale University. American Politics and Public Policy Workshop. September 2013. “Trading Democracy for Justice.”
- American Political Science Association Annual Meeting. August 2013. “The Heavenly Chorus Is Even Louder: The Growth and Changing Composition of the Washington Pressure System.” With Kay Lehman Schlozman, Sidney Verba, Henry Brady, and Phillip Jones.
- National Bar Association, Miami Florida, July 2013. “The Collateral Consequences of Mass Imprisonment.”
- Loyola University. American Politics Workshop. December 2012. “Mass Imprisonment and Neighborhood Voter Turnout.”
- Marquette University School of Law. November 2012. “The Collateral Consequences of Mass Imprisonment.”
- Yale University. Detaining Democracy Conference. November 2012. “The Effects of Imprisonment and Community Supervision on Political Participation.”
- Brown University. American Politics Workshop. October 2012. “Mass Imprisonment and Neighborhood Voter Turnout.”
- American Bar Association National Meeting, August 2012. “Mass Imprisonment: Consequences for Society and Politics.”
- University of Madison-Wisconsin. American Politics Workshop. March 2012. “The Spatial Concentration of Imprisonment and Racial Political Inequality.”

- American Political Science Association Annual Meeting. 2011. “Theme Panel: How Can Political Science Help Us Understand the Politics of Decarceration?”
- University of Pennsylvania. Democracy, Citizenship, and Constitutionalism Conference. April, 2011. “Vicarious Imprisonment and Neighborhood Political Inequality.”
- University of Chicago School of Law. Public Laws Colloquium. Chicago, IL. November, 2010. ““The Effects of Neighborhood Incarceration Rates on Individual Political Efficacy and Perceptions of Discrimination.”
- Pomona College. November, 2010. “Incarceration Nation.”
- University of Washington. Surveying Social Marginality Workshop. October 2010. “Using Government Data to Study Current and Former Felons.”
- American Bar Foundation, Chicago, IL, September 2010. “The Effects of Neighborhood Incarceration Rates on Individual Political Attitudes.”
- Northwestern University. Chicago Area Behavior Conference. May 2010. “Trading Democracy for Justice: The Spillover Effects of Incarceration on Voter Turnout in Charlotte and Atlanta.”
- Annual Meeting of the Law and Society Association, Chicago, IL, May 2010. “Neighborhood Criminal Justice Involvement and Voter Turnout in the 2008 General Election.”
- Annual Meeting of the Southern Political Science Association, Atlanta, GA, January 2010. “The Art and Science of Voter Mobilization: Grassroots Perspectives on Registration and GOTV from Charlotte, Atlanta, and Chicago.”
- University of Illinois at Chicago. Institute for Government and Public Affairs. November 2009. "Turnout and Party Registration among Convicted Offenders during the 2008 Presidential Election."
- Annual Meeting of the American Political Science Association, Toronto, Ontario, Canada, September 2009. "'I Wanted to Vote for History:' Turnout and Party Registration among Convicted Offenders during the 2008 Presidential Election."
- Harris School of Public Policy, University of Chicago. American Politics Workshop. December 2008. “Trading Democracy for Justice? The Spillover Effects of Imprisonment on Neighborhood Voter Participation.”
- Northwestern University School of Law. Law and Political Economy Colloquium. November 2008. “Did Disfranchisement Laws Help Elect President Bush? New Evidence on the Turnout Rates and Candidate Preferences of Florida's Ex-Felons.”



- University of California, Berkeley. Center for the Study of Law and Society. October 2008. "Trading Democracy for Justice? The Spillover Effects of Imprisonment on Neighborhood Voter Participation."
- Law and Society Association Annual Meeting, Montreal, Canada, May 2008. "Did Disfranchisement Laws Help Elect President Bush? New Evidence on the Turnout Rates and Candidate Preferences of Florida's Ex-Felons."
- Law and Society Association Annual Meeting, Montreal, Canada, May 2008. "Trading Democracy for Justice? The Spillover Effects of Imprisonment on Neighborhood Voter Participation."
- Midwest Political Science Association Conference, Chicago, IL, April 2007. Paper: "Concentrated Incarceration: How Neighborhood Incarceration Decreases Voter Registration."

### **Working Papers**

- "Which Lives Matter? Factors Affecting Public Attention and Protest In Response to Officer-Involved Killings"
- "Not All Black Lives Matter: The Role of Victim Characteristics in Shaping Political Interest and Voter Turnout"
- "Explaining Protests of Officer-Involved Killings"
- "Introduction" (with Jenn Jackson and Periloux Peay) in *Freedom Dreams: A Symposium on Abolition*. Eds. Jenn Jackson, Periloux Peay, and Traci Burch. Social Science Quarterly.
- "The Effects of Community Police Performance on Protest in Chicago" (For Symposium Honoring John Hagan)
- "How Police Departments Frame Low-Threat Victims of Officer-Involved Killings"

### **Additional Activities**

- Expert witness in *Kelvin Jones vs. Ron DeSantis, etc. et al.* (U.S. District Court for the Northern District of Florida Consolidated Case No. 4:19-cv-00).
- Expert witness in *Community Success Initiative, et al., Plaintiffs v. Timothy K. Moore* (Superior Court, Wake County, NC Case No. 19-cv-15941).

- Expert witness in *People First of Alabama v. Merrill* (U.S. District Court in Birmingham, Alabama, Case No. 2: 20-cv-00619-AKK)
- Expert witness in *Florida State Conference of the NAACP v. Lee* (U.S. District Court in the Northern District of Florida, Case No. 4:21-cv-00187-MW-MAF)
- Expert witness in *One Wisconsin Institute Inc. v. Jacobs* (U.S. District Court in the Western District of Wisconsin, Case No. 15-CV-324-JDP).

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# EXHIBIT E

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**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA**

**ATLANTA DIVISION**

ALPHA PHI ALPHA FRATERNITY INC., et  
al.;

*Plaintiffs,*

vs.

BRAD RAFFENSPERGER, in his official  
capacity as Secretary of State of Georgia.

*Defendant.*

Case No. 1:21-cv-05337-SCJ

**DECLARATION OF DR. JASON MORGAN WARD**  
**PRELIMINARY REPORT**

**January 6, 2022**

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## I. SUMMARY OF OPINIONS

My name is Jason Morgan Ward. I am Professor of History at Emory University. I have been retained by the plaintiffs in this litigation to prepare a report on the history of voter intimidation, racial violence, and racial appeals in Georgia from the end of the Civil War to the present. My report focuses on the role of racial intimidation, violence, and rhetoric in suppressing the political participation and undermining the voting rights of Black Georgians. I am being compensated for my work at a rate of \$250 per hour, in addition to reasonable expenses for my services. My compensation is not contingent on the analysis and opinions offered or on the outcome of this litigation. Based on my professional training, historical expertise, and review of the research materials summarized below, it is my opinion that:

- Georgia has a long history of state-sanctioned discrimination against Black voters that extended beyond written law to harassment, intimidation, and violence. Voter intimidation and racial violence in Georgia has increased in historical moments where defenders of white political control perceived their power to be threatened. Historically, the threat of violence has consistently served as a precursor to restrictions on voting but also as a rationale for those policies.
- Racial appeals, both overt and subtle, have characterized political campaigns and advocacy for voting restrictions since the end of the Civil War. This pattern persists into the present. In Georgia, racial appeals have evolved from overt and inflammatory rhetoric in the Reconstruction, Jim Crow, and civil rights eras to an intentionally coded language that conflates Black voting with urban politics, the welfare state, federal intervention, and electoral corruption.
- Voter suppression tactics have evolved as well, but the history of racial violence, intimidation, and appeals is not a linear story of progress and refinement. Georgia Democrats in the late-nineteenth and early-twentieth century murdered political adversaries, but they also pioneered an array of voter restrictions—including poll taxes, literacy tests, and exemption clauses—that survived legal challenges precisely because they intentionally avoided mention of race. In response to the voting rights reforms and renewed Black political participation by the middle of the twentieth century, state and local officials utilized legal maneuvers and bureaucratic tactics like purges and challenges that closely resemble present-day voter suppression.
- Disfranchisement and vote dilution are racial, but they are also spatial. Redistricting emerged as a favored tactic of advocates of voting restrictions in the decades after the demise of the county-unit system, a distinct Georgia institution that diluted urban voting strength by assigned electoral votes (“units”) in party primaries of two, four, and six to rural, town, and city counties. This system inflated the power of rural counties—which possessed two-thirds the voting power of urban counties despite their much smaller populations—and entrenched political power in rural Georgia. That spatial dynamic persists in efforts to discredit and dilute the electoral power of the state’s growing metropolitan areas via legislative redistricting.

## II. BACKGROUND AND QUALIFICATIONS

I am currently employed as Professor and Director of Graduate Studies in the Department of History at Emory University. I received a B.A. (2001) in history, with highest honors, from Duke University (2001), and an M.A. (2005), M.Phil. (2006), and Ph.D. (2008), all in history, from Yale University.

I specialize in the history of the modern United States, with a focus on the American South, politics, civil rights, and racial violence. I have published book-length studies on the history of racial violence in the twentieth-century South and the politics of white supremacy and racial segregation in the mid-twentieth century. My 2011 book, *Defending White Democracy: The Making of a Segregationist Movement and the Remaking of Racial Politics, 1935-1965*, required extensive research in Georgia's political history. In addition, I have published peer-reviewed articles and book chapters on the South's relationship with the federal government, white supremacist violence, and the role of the historical memory of Reconstruction in twentieth-century southern politics. In total, I have published two books, eleven chapters and articles, and numerous shorter essays and reviews.

I present regularly to academic and lay audiences, and I have provided commentary on racial politics, racial violence, and civil rights for *CNN*, *New York Times*, *Washington Post*, *Los Angeles Times*, *Atlanta Journal-Constitution*, and *The American Historian*. I have taught undergraduate and graduate courses in my area of specialization for fourteen years. I have attached a detailed record of my professional qualifications in the attached curriculum vitae, which I prepared and know to be accurate.

## III. SOURCES AND MATERIALS REVIEWED

In preparing this report, I have consulted a broad range of sources on politics, civil rights, voter intimidation, and racial violence in Georgia, from the end of the Civil War to the present. Sources that I have consulted include: published works by historians and other scholars, historical newspapers, state and federal government records, published reports from state and federal agencies, and the papers of historical figures and organizations.

## IV. DISCUSSION

### Introduction

The purpose of this report is to outline the history of racial violence, intimidation, and appeals, and their relationship to politics in Georgia since the Civil War. Since the constitutional revolution of the Reconstruction era, which defined newly emancipated Black Georgians as citizens of the United States with suffrage and civil rights, those seeking to limit Black voting have consistently utilized violence, intimidation, and racial appeals in response to perceived and actual threats to their political power. This report will highlight pivotal moments in the evolution of racial politics and white resistance to racial change, with a focus on the connection between rhetoric, action, and policy in the history of voter intimidation, suppression, and dilution.

The history of voter intimidation and disfranchisement in Georgia and across the South reveals the power of racial rhetoric but also its malleability. Those who have sought, and fought, to limit the franchise since the extension of equal protection and prohibitions on discrimination in the wake of the Civil War have shifted identities and affiliations. Like party affiliations, the rhetorical justifications for voter suppression have evolved. Regardless of these shifts in political identity and language, attempts to limit the franchise have consistently revolved around race and, more specifically, the civic fitness of Black Americans and other racial and ethnic minorities for equal protection and participation in Georgia's governance.

In the century between Civil War and Civil Rights, those seeking to limit voting rights experimented with a range of political strategies, policy solutions, and extralegal methods, many of which appeared at first glance to be ostensibly nonracial despite their demonstrably racial motives and results. Georgia, arguably more than any other southern state, reflects the broad range of strategies that politicians of all stripes employed to restrict Black voting rights as well as the variety of rhetorical strategies they used to justify this political agenda. Few states were as systematic and comprehensive in their attempts to deny the franchise to Black citizens, and thus it is no surprise that Georgia's history of voter intimidation and racial violence rivals that of its most notorious counterparts.

Beyond overt racial appeals, this report highlights two consistent patterns of political rhetoric and mobilization to fuel violent resistance to Black politics and justify policy initiatives aimed at neutralizing the threat it posed to white dominance. The first of these patterns is the connection that defenders of white political control have drawn between local and national politics, which from the antebellum era to contemporary voting rights struggles has centered on the power of the federal government to intervene in local affairs to ensure equal protection and civil rights. Consistently, when local and state officials in Georgia have perceived seemingly distant and abstract political developments as threats to the racial status quo, inflammatory rhetoric, intimidation, and violence increased in response.

A second consistent and distinguishing feature of Georgia's history of racial politics and violence is the exploitation of the rivalry between rural and urban—particularly the Atlanta metropolitan area. As demonstrated by the 1906 Atlanta riot that precipitated a wave of disfranchisement measures two years later, the implementation of a county-unit system that diluted urban political power and a moderating influence on state politics, and a persistent rhetorical strategy that equates urban politics with corruption and malfeasance, advocates of voting rights restrictions in Georgia have gone to greater lengths than their counterparts in other southern states to undermine and delegitimize urban political power.

That their primary target, Atlanta, is the modern South's most populous and most multicultural metropolitan area only underscores that symbolic and strategic importance of the urban/rural divide in Georgia's racial politics. By the 1950s, the urban "bloc" vote had become the stand-in for the "Black" vote among voting rights opponents, and they have consistently targeted Georgia's cities with voter suppression and dilution tactics in the decades since. With the demise of the county unit system, redistricting became the primary battleground for diluting the power of Black voters.

### Emancipation, Reconstruction, and “Redemption” (1865-1877)

The emancipation of enslaved Black Georgians and the extension of civil rights and protections via the “Reconstruction Amendments” to the United States Constitution (the Thirteenth, Fourteenth, and Fifteenth Amendments) revolutionized politics in a state whose constitution had previously barred all Black men—free or enslaved—from voting. In the first two years following Confederate surrender, Georgia’s white legislators resisted this constitutional revolution by voting nearly unanimously to reject the Fourteenth Amendment in 1866 and, two years later, to expel twenty-nine newly elected Black Republican legislators from the General Assembly. The next year, the Republican governor presided over the white-majority legislature’s rejection of the Fifteenth Amendment. Georgia’s defiance, expressed through political channels and an increasing barrage of violence, prompted the federal government to resume military occupation of the state by the end of 1869.

Beyond the legislature, the newly established Ku Klux Klan, a terrorist wing of the Conservative-Democratic coalition led by ex-Confederate general John B. Gordon, engaged in a spree of political assassinations and massacres aimed at Black Georgians and their white Republican allies. Others joined in the violence and intimidation unmasked. In anticipation of the 1868 campaign season, Georgia Democrats called on their supporters to “clean up their muskets, rifles, and shot guns.”<sup>1</sup> On September 15, an armed band of white supporters in Camilla opened fire on a mostly Black group of marchers who had entered the town to stage a Republican political rally. The Camilla Massacre claimed as many as a dozen Black victims, several of whom died at the hands of white attackers who pursued fleeing marchers and summarily executed wounded defenseless Black marchers they encountered. The notorious event not only depressed Republican turnout in Black-majority southwest Georgia, but also emboldened white Democrats to stuff ballot boxes, throw out Republican votes, and step up their anti-Reconstruction rhetoric.<sup>2</sup>

The upsurge in violence and corruption during the 1868 campaign season—a presidential election year—illustrated not only the political calculus of racial violence but also the connection between local and national politics. The violence served not only to demoralize and depress support for Reconstruction in Georgia and beyond, but also to demonstrate the illegitimacy of Georgia’s interracial coalition government and its inability, despite federal support, to maintain order and keep people safe. In the words of a former Confederate officer, the Klan’s terror campaign had a clear political objective: “to defy the reconstructed State Governments, to treat them with contempt, and show that they have no real existence.”<sup>3</sup>

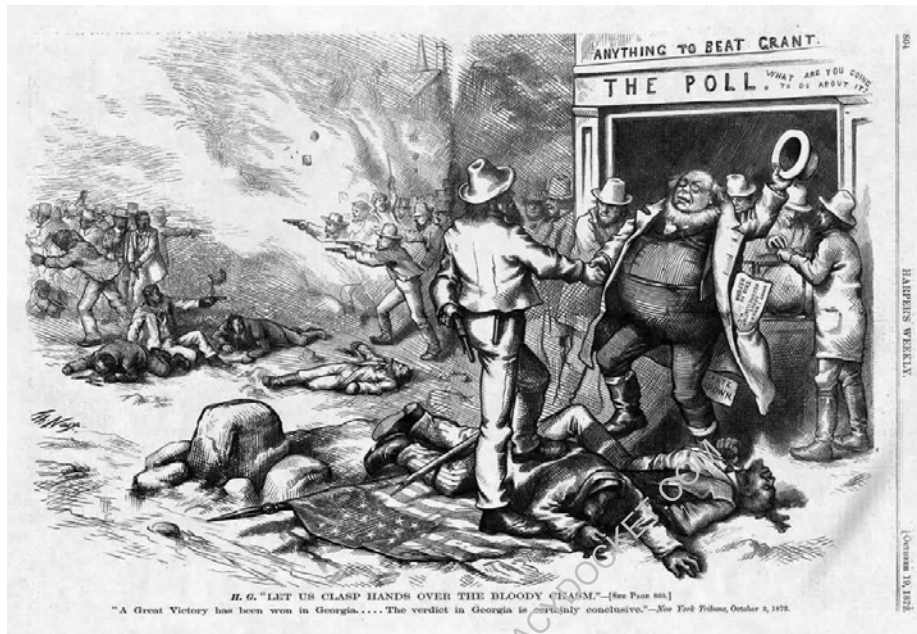
The violence in Georgia and throughout the South inspired an unprecedented effort by the federal government to enforce voting rights and root out Klan terrorists, a campaign spearheaded by the nation’s first attorney general—white Georgia Republican Amos Akerman. However, persistent racial violence and voter intimidation in Georgia not only resulted in a relatively swift reestablishment of white Democratic control following the midterm elections in 1870, but also provided a blueprint for other southern states to resist Reconstruction. Recurrent violence during the 1872 elections demonstrated that Democrats would consolidate their control through force.

<sup>1</sup> Carole Emberton, *Beyond Redemption: Race, Violence, and the American South After the Civil War* (Chicago: University of Chicago Press, 2013), 138.

<sup>2</sup> Lee W. Formwalt, “The Camilla Massacre of 1868: Racial Violence as Political Propaganda,” *The Georgia Historical Quarterly* 71, no. 3 (Fall 1987): 399-426.

<sup>3</sup> Eric Foner, *A Short History of Reconstruction, 1863-1877* (New York: Harper Perennial, 1990), 191.

“Burke County, with an actual Republican majority of 1,500,” *Harpers Weekly* reported, “has been Ku-Kluxed into showing a Democratic majority of 800.” Elsewhere, gun-wielding vigilantes and “sabre clubs” patrolled roads and polling places to depress Black turnout.<sup>4</sup>



Courtesy Harpers Weekly, 19 October, 1872.

Racial violence and voter intimidation during Reconstruction demonstrated a pattern that persisted in subsequent political struggles over Black politics. In terms of strategy and tactics, Georgia frequently led the way. At other times, Georgia followed the blueprint laid out by its southern “sister” states. In all cases, disfranchisement was simultaneously a coordinated regional effort and a struggle that played out differently from state to state.

That interplay between state, region, and nation helps explain Georgia’s active role in the struggle to end Reconstruction and undermine interracial politics after 1871. In neighboring South Carolina, a coalition of Black and white Republicans retained control until 1876, a presidential election cycle that culminated in the formal end of Reconstruction. That summer, just across the river from Augusta, white vigilantes followed the blueprint laid out in Camilla eight years earlier and attacked local Black militiamen marching in a Fourth of July parade. Reinforced by white Georgians who hauled a cannon across the Savannah River to fire at barricaded militiamen, the heavily armed vigilantes disarmed their opponents and executed six Black men. A survivor later testified that a man shouted, “By God! We will carry South Carolina now!” during the attack.<sup>5</sup>

This pattern of seemingly spontaneous “riots” continued into the fall, when white Democrats in the three southern states still under Republican control contested electoral votes that would decide

<sup>4</sup> “The Georgia Election,” *Harpers Weekly*, 19 October 1872, 883.

<sup>5</sup> *South Carolina in 1876: Report on the Denial of the Elective Franchise in South Carolina at the State and National Election of 1876* (GPO, 1877), 47.



the presidency and threatened violent resistance if Democrat Samuel Tilden was not inaugurated in early 1877. With the threat of “Tilden or Blood” looming over the nation’s capital, national leaders reached a compromise that awarded the disputed electoral votes from South Carolina, Louisiana, and Florida—and thus the presidency—to Republican Benjamin Hayes in exchange for his promise to withdraw remaining federal troops from the South. Just months later, delegates gathered in Atlanta to write a new state constitution that upheld the poll tax and wrote racial segregation into state law. Former state legislator, congressman, and senator Robert Toombs reportedly boasted that “the Negro shall never be heard from” under the newly ratified Constitution of 1877.<sup>6</sup>

### **Redemption’s Incomplete Victory and the Push for Black Disfranchisement (1877-1908)**

While Reconstruction as a policy and political regime was relatively short-lived, the lessons of Reconstruction lived on in the rhetoric, symbols, and actions of opponents of Black voting rights for generations. For advocates of white supremacy, the lesson handed down from the “redeemers” who overthrew Reconstruction was that Black politics—and any outside attempt to promote or enforce Black political participation—must be met with unified and vigorous resistance. The violent suppression of Reconstruction did not eradicate Black politics from Georgia, but it provided the rationale for an ongoing campaign to stamp out Black civic equality by any means necessary.

Even moderating voices such as Atlanta’s Henry Grady, who advocated for a New South agenda of economic modernization, made clear that the foundation of a peaceful and prosperous South rested on white political unity and black disfranchisement. “The very worst thing that could happen to the South,” he warned in an 1888 speech, “is to have her white vote divided into factions, and each faction bidding for the negro who holds the balance of power.” Like most white Georgians of his generation, Grady lived in the wake of Reconstruction and imbibed the anti-Black rhetoric that white supremacists handed down—that Black Georgians were, in his words, “a vast mass of impulsive, ignorant, and purchasable votes.”<sup>7</sup>

This argument fueled the push for a Solid South in which white voters closed ranks around a single-party system in which the Democrats—the “white man’s party” that “redeemed” the South from Reconstruction—held sway with no viable political opposition. That argument also fueled a push to write Black Georgians out of politics through legislation, a self-proclaimed white supremacy campaign that picked up steam in the 1890s and resulted in a barrage of disfranchisement measures adopted state-by-state over two decades.

This renewed push to make permanent the stated political objectives of the anti-Reconstruction Democrats was in part a response to the ongoing, if diminished, presence of Black southerners in state and local politics but also the emergence of political challenges to one-party rule. The most immediate threat to single-party rule in Georgia, and the movement that seemed the most receptive to Black political participation, was the agrarian Populist movement that swept the nation in the early 1890s. In North Carolina, for example, Populists and Republicans formed a “fusion” coalition that took control of state government in 1894. In Georgia, Populists made a

<sup>6</sup> J. Morgan Kousser, *The Shaping of Southern Politics: Suffrage Restriction and the Establishment of the One-Party South, 1880-1910*, (New Haven: Yale University Press, 1974), 209.

<sup>7</sup> *Life and Labors of Henry W. Grady: His Speeches, Writings, Etc.* (New York: H.C. Hudgins and Co, 1890), 296-7.

similar attempt to do precisely what Grady had warned against—splitting the white vote and appealing to Black Republicans to gain the political advantage.

The Populist threat to single-party rule and white unity proved sufficiently disconcerting to Georgia Democrats that they ramped up their campaign of white supremacist rhetoric and violence. Following the Populists' success in the 1890 midterms, the Democrats engaged in widespread fraud and intimidation—including marching Black laborers to polling places to cast ballots in favor of Democrats—during the 1892 elections.<sup>8</sup> After fending off the Populist challenge with the help of coerced Black votes, Democrats in Georgia implemented the most explicitly racial of the state's disfranchisement tactics—the white primary. Adopted in 1900 by the state party's executive committee, the measure created a primary system in which “the white Democrats of the state may give expression of their choice.” By permitting political parties to set the rules for state-supported primaries, Georgia officials endorsed the elimination of Black voters from the only elections that mattered in the one-party Solid South.<sup>9</sup>

NORTH CAROLINA'S SWEET WOMANHOOD APPEALS TO THE BALLOT FOR PROTECTION



Figure 2: White Georgians followed closely news of white supremacy campaigns in other southern states and celebrated reestablishment of Democratic control in North Carolina in 1898. Georgia Democrats used similar arguments and imagery to discredit their political opponents and build momentum for their own disfranchisement measures adopted ten years later. Courtesy *Atlanta Constitution*, 2 October 1898, 5.

The adoption of the white primary marked the opening salvo in a decade marked by increasingly volatile racial rhetoric, a deadly race riot, and a resulting wave of disfranchisement measures more sweeping than any other southern state. In the months leading up to the 1906 governor's race, candidates played to white fears of Black social and political advancement. Clark Howell, editor of the *Atlanta Constitution*, and his opponent, former *Atlanta Journal* publisher Hoke Smith, used their respective papers to consolidate white public support for disfranchisement. Both newspapermen appreciated the power of the press to mobilize white voters, particularly through cartoons and editorials warning of “Negro domination” and imperiled white women.

Building on a rhetorical strategy that linked Black politics to *social equality*—a euphemism for interracial sex and miscegenation—the state's leading newspapers fanned the flames of white

resentment by running unsubstantiated reports of Black assaults on white women. The propaganda campaign reached a crescendo in late September of 1906, when white mobs responded by attacking hundreds of Black Atlantans and killing as many as forty victims over the course of several days. The Atlanta Race Riot made headlines across Europe and undercut the

<sup>8</sup> C. Vann Woodward, *Tom Watson: Agrarian Rebel* (New York: MacMillan, 1938), 241-2.

<sup>9</sup> Quoted in Russell Korobkin, “The Politics of Disfranchisement in Georgia,” *The Georgia Historical Quarterly* 74 (Spring 1990), 40.

city's progressive image, but the violence and overt racial appeals provided more momentum for disfranchisement. In its 1906 platform, the Georgia Democratic Party called for an amendment to the state constitution designed "to exclude the largest possible percentage of the ignorant and purchasable negro vote, under the limits imposed by the Federal Constitution."<sup>10</sup>

The reference to the U.S. Constitution revealed a crucial component of southern white supremacist legislative and legal strategy. The architects of disfranchisement understood that explicitly racial election restrictions would face legal challenges on the grounds that they violated the "Reconstruction Amendments" that had extended citizenship and suffrage to Black Americans. They responded with a web of facially non-racial restrictions and requirements that would ensnare Black men while allowing white registrants to pass through. Georgia congressman Thomas Hardwick, who had first proposed the literacy test requirement as a state legislator in 1899, proclaimed that such measures should simultaneously "disfranchise every negro voter who can possibly be disfranchised" and "protect and safeguard every white voter in Georgia, however humble, however poor, however illiterate."<sup>11</sup>

Given that similar measures in other states withstood a Supreme Court challenge in *Williams v. Mississippi* (1898), Georgia Democrats forged ahead with a 1907 act to add a literacy test requirement to the state constitution. The amendment, which Georgia voters approved the following year, also included the so-called "fighting grandfather clause," a provision that exempted white registrants from the literacy requirement provided their ancestors had served in the Civil War, and a "good character" clause that empowered local registrars to find loopholes for semi-literate white citizens to register while adding pretexts to disqualify literate Black citizens. Combined with the poll tax, another ostensibly non-racial requirement that survived the reforms of the Reconstruction era and was later upheld in *Williams*, Georgia had erected the most imposing array of obstacles to Black voter registration of any southern state by the end of the twentieth century's first decade. As Georgia voting rights expert Laughlin McDonald concludes in his authoritative 2003 study, "no state was more systematic and thorough in its efforts to deny or limit voting and officeholding by African Americans after the Civil War."<sup>12</sup>

### **The Politics of Mob Violence and Historical Memory (1880s-1930s)**

The southern white supremacy campaigns that culminated in Georgia's 1908 disfranchisement amendments inspired a campaign of terror meant to force Black citizens into a subordinate state. The 1890s began with a Mississippi constitutional convention called—in the words of state representative and future U.S. Senator James K. Vardaman, "to eliminate the nigger from politics" and ended with a violent coup that restored Democratic control in North Carolina.<sup>13</sup>

<sup>10</sup> "Text of the Platform Adopted by the Democratic Convention," *Atlanta Constitution*, 5 September 1906, p. 6; Michael Perman, *Struggle for Mastery: Disfranchisement in the South, 1888-1908* (University of North Carolina Press, 2001), 290.

<sup>11</sup> "Hon. Thos. Hardwick Addresses Convention," *Atlanta Constitution*, 5 September 1906, p. 2. For more on Hardwick's role in Black disfranchisement measures, see R. Volney Riser, *Defying Disfranchisement: Black Voting Rights Activism in the Jim Crow South, 1890-1908* (Louisiana State University Press, 2013), 97-98.

<sup>12</sup> Perman, *Struggle for Mastery*, 297; Laughlin, *A Voting Rights Odyssey: Black Enfranchisement in Georgia* (Cambridge University Press, 2003), 2.

<sup>13</sup> Quoted in Gloria J. Brown-Marshall, *The Voting Rights War: The NAACP and the Ongoing Struggle for Justice* (Rowman and Littlefield, 2016), 13.

During the decade, as Georgia Democrats campaigned for disfranchisement, lynching surged statewide. Georgia mobs lynched nearly two hundred victims during the 1890s, an average of roughly one victim per month. While the reasons given for these extrajudicial killings varied, the increase in mob violence proceeded apace with inflammatory campaigns to erase Black Georgians from public life.

Advocates of disfranchisement, including prominent state and local officials, stoked fears of Black criminality and interracial sexuality to achieve their political objectives, and lynch mobs responded by targeting Black Georgians accused of rape, murder, and other acts of aggression toward white victims. In 1889, sixty white men lynched Black laborer Dan Malone after he allegedly “attempted to assault a respectable white woman” in Henry County.<sup>14</sup> Newspaper reports rarely challenged local accounts of mob violence, which took for granted the guilt of the victims. Mob violence provoked by rape allegations proved particularly brutal and ritualistic. In the waning months of Georgia’s most deadly lynching decade, hundreds gathered in Coweta County in 1899 to torture, mutilate, and burn Sam Hose, a Black laborer accused of killing his employer and then raping his wife. Atlantans who had ventured to Newnan for the spectacle reportedly returned home with charred bones and wood scraps as souvenirs.<sup>15</sup>

Apologists for lynching drew a direct line between Black politics and Black crime. “So long as your politics take the colored man into your embrace on election day...,” Georgia reformer and suffragette Rebecca Latimer Felton warned in 1898, “and so long as the politicians use liquor to befuddle his understanding and make him think he is a man and a brother...so long will lynchings prevail.” Felton, the wife of a former Georgia congressman, and who would later become the first woman to serve in the U.S. Senate, argued that if mob violence was necessary “to protect woman’s dearest possession from the ravaging human beasts—then I say lynch; a thousand times a week if necessary.”<sup>16</sup>

As Felton’s argument makes clear, lynching was an inherently political act because those who participated perceived their Black victims—and any Black person they believed to be defying white supremacy in any way—as a threat to the political and social order they were trying to create. Consequently, mob violence increased as white supremacists built a web of legislative and constitutional barriers to voting. However, even after advocates of disfranchisement achieved their stated political objectives with the establishment of the Democratic white primary in 1900 and the literacy test amendment eight years later, white Georgians continued to lynch Black victims. In fact, in the decade (1910-1920) following the disfranchisement push, the number of recorded lynchings in Georgia increased. That the practice persisted demonstrates that racial violence served not only as a tactic to achieve political goals but also a tool for maintaining political control. Ongoing mob violence reflected key lessons handed down from Reconstruction—that Black politics was a problem that would not stay settled, and that generation after generation would have to guard against the reemergence of that threat.

School curriculum and popular culture reinforced these lessons. A survey of social studies and history textbooks published during the era identified three recurrent themes American

<sup>14</sup> “A Negro Lynched,” *New York Times*, 23 July 1889, 1

<sup>15</sup> Philip Dray, *At the Hands of Persons Unknown: The Lynching of Black America* (Modern Library, 2003), 13-14.

<sup>16</sup> J.A. Holman’s coverage of Felton’s speech in the *Atlanta Journal* was reprinted in the Wilmington [N.C.] *Weekly Star*, August 26, 1898, p. 1, in the weeks before the deadly Wilmington Massacre. Crystal Feimster, *Southern Horrors: Women and the Politics of Rape and Lynching* (Harvard University Press, 2009), 127.



schoolchildren learned about Black voters and public officials during the Reconstruction era—they were ignorant, lazy, and corrupt. “In the exhausted states already amply ‘punished’ by the desolation of war,” David Saville Muzzey wrote in his popular *History of the American People*, “the rule of the Negro and his unscrupulous carpetbagger and scalawag patrons, was an orgy of extravagance, fraud and disgusting incompetency.” This national consensus on Reconstruction filtered down from Ivy League professors and best-selling textbook authors to local historians. In a history of McDuffie County, Georgia, sponsored by the local chapter of the United Daughters of the Confederacy (UDC), the authors concluded that “the Negro gained nothing by his adventure in politics; he did not have the stability nor reasoning power to really give to politics any thing worth while and was only the tool in the hands of others.”<sup>17</sup>

Popular culture also reinforced the notion that violence was necessary to eliminate the “menace” of Black politics. The 1915 blockbuster *The Birth of a Nation*, an adaptation of a series of wildly popular novels by Thomas Dixon, rehabilitated the Ku Klux Klan as heroes who subdued emboldened and lustful Black men and saved the South from the horrors of Reconstruction. The film inspired the Klan’s resurgence, a national phenomenon launched later that year in a cross-burning ceremony at Georgia’s Stone Mountain.



Figure 3: This commemorative postcard memorialized the rebirth of the Ku Klux Klan at Stone Mountain on Thanksgiving Day, 1915. The Klan soon spread nationwide and enlisted several million members.

The owner of the mountain, a prominent Georgia Klansman, soon deeded the north face to the UDC for a Confederate memorial that would be completed a half century later. Atlanta UDC leader Helen Plane advocated for inclusion of hooded Klansmen in the planned bas relief sculpture. The Klan “saved us from negro domination and carpet-bag rule,” she argued, so it was fitting “that it be immortalized on Stone Mountain.”<sup>18</sup> While the eventual sculpture would feature only Jefferson Davis, Robert E. Lee, and Stonewall Jackson, the political message of Confederate memorialization was clear—violence and intimidation was necessary to prevent challenges to white political and social dominance.

<sup>17</sup> W.E.B. du Bois, *Black Reconstruction in America* (New York: Russell and Russell, 1935), 712; Quoted in McDonald, *Voting Rights Odyssey*, 44.

<sup>18</sup> David B. Freeman, *Carved in Stone: The History of Stone Mountain* (Mercer University Press, 1997), 61-62.



### **The Nationalization of Civil Rights and the End of “the White Man’s Party” (1908-1948)**

The threats that white supremacists perceived were at once immediate and distant, as the forces of migration, urbanization, and war mobilization transformed Georgia. Discrimination and violence accelerated the exodus of Black Georgians from rural areas, both to the state’s growing cities but also to northern industrial areas where they could exert greater political pressure. Just as white resentment of Atlanta’s increasingly prosperous Black middle class helped to fuel the 1906 race riot, anxieties about Black mobility and mobilization in the 1910s boiled over in recurrent and brutal acts of violence.

The equation of Black advancement with imperiled white womanhood persisted, as evidenced in the 1918 Fayette County lynching of a Black man accused of assaulting a white woman and kidnapping her baby.<sup>19</sup> Yet white mobs expressed little regard for Black womanhood later that year, when they lynched Mary Turner for threatening to report the mob killing of her husband to authorities. In response, a mob hung her upside down from a tree, set her on fire, cut her unborn baby from her womb, and stomped the fetus while she burned to death. The Turners were two of at least eleven victims killed in a lynching spree through Brooks and Lowndes counties.<sup>20</sup>

The violence of 1918 spilled over into 1919, as white mobs targeted returning Black World War I veterans and responded to perceived threats to white supremacy. An April “riot” in Jenkins County, which claimed at least four Black victims, and a May lynching in Warren County attended by an estimated three hundred white farmers, foreshadowed a summer of violence that swept the nation during the “Red Summer” of 1919. Mobs in Georgia burned Black churches, targeted Black men accused of criticizing racial discrimination, and, in Early County, beat a Black veteran to death for refusing to take off his military uniform.<sup>21</sup> These brutal incidents not only demonstrated that disfranchisement had failed to stem racial conflict, as its advocates had promised it would, but also fueled a national protest campaign that resulted in a series of federal anti-lynching bills sponsored by northern congressmen who answered to a growing number of Black constituents—many of them migrants from southern states like Georgia.

Anxieties over Black mobility and rural decline also help to explain why the state legislature chose in 1917 to formalize a scheme that diluted the power of urban voters in state primary elections. The county unit system, which allotted six votes each to eight urban counties, four votes each to thirty “town” counties, and two votes each to 121 “rural” counties, effectively negated the power of Georgia’s growing towns and cities to counter the disproportionate power of the state’s rural political elites.

That disproportionate share of power trickled up to national politics via existing disfranchisement and dilution tactics like the poll tax. While defenders of the requirement openly expressed their desire to avoid depressing the white vote, critics pointed out that the tax depressed white voter turnout to rates far below those in states that did not require the tax. Anti-poll tax researchers pointed out that more Rhode Island voters cast ballots for their two representatives to Congress than voters in Georgia and three fellow poll-tax states cast for their thirty-two congressmen. A Georgian could win election and rise through the ranks of congressional seniority with as few as

<sup>19</sup> “Negro Lynching by Georgia Mob,” *New York Times*, 19 February 1918

<sup>20</sup> Walter F. White, “The Work of a Mob,” *The Crisis* 16 (September 1918): 221-3

<sup>21</sup> Cameron McWhirter, *Red Summer: The Summer of 1919 and the Awakening of Black America* (Henry Holt, 2011), 1-11, 51; “Crime,” *The Crisis* 18 (July 1919): 155

five thousand votes per election, while a candidate from a northern state might require twenty times as many votes to win a seat in Congress.<sup>22</sup>

Political leaders committed to preserving this power imbalance on the local, state, and national level were the earliest and most vocal opponents of voting rights campaigns. In 1936, Governor Eugene Talmadge, a former state agricultural commissioner who capitalized on the county-unit system formidable rural support base, attacked the liberalizing national Democratic Party for undermining white supremacy in Georgia. Talmadge argued that the Roosevelt administration had caved to northern Black political pressure and could no longer be trusted to remain the “white man’s party” of previous generations. He sought to undermine support for popular New Deal relief programs by spreading false rumors that the Works Progress Administration and other federal agencies were forcing white women to work in desegregated facilities. Through his inflammatory tabloid *The Statesman* and increasingly vitriolic speeches, Talmadge argued that President Franklin Roosevelt and national Democrats were actively wooing Black voters previously loyal to the Republican Party, in language that paralleled the white supremacist attacks on Reconstruction.

Georgia’s political establishment attempted to distance itself from racial extremism on the grounds that white supremacy was firmly established. Continued agitation of racial issues by white politicians, they argued, was irresponsible. When Eugene Talmadge attempted to “primary” former governor and first-term U.S. senator Richard Russell in 1936, Russell had to both pledge allegiance to the racial status quo and distance himself from his inflammatory challenger. “Any southern white man worth a pinch of salt would give his all to maintain white supremacy,” former governor and first-term U.S. senator Richard Russell lamented in 1936, “and it is a disgrace that some should constantly seek to drag the negro issue into our primaries, where as a matter of fact they do not in any way participate and cannot.”<sup>23</sup>

Nationally, Talmadge and his allies pointed to proposed anti-lynching legislation, and anti-poll tax campaign to argue that white supremacy was under attack. By the end of the 1930s, caught between hardcore white supremacists at home and an increasingly liberal national Democratic Party, establishment Georgia Democrats amped up their racial rhetoric and condemned threats to white supremacy. Just two years after fending off a race-baiting primary challenge from Talmadge in 1936, Georgia senator Richard Russell joined a southern filibuster of an anti-lynching bill during which he complained that his party had become the “Afro-Democratic Party” and warned of a slippery slope of civil rights legislation that would culminate in a bill allowing for racial intermarriage.<sup>24</sup> Two years later, Russell’s senior colleague Walter George repackaged Reconstruction-era fears of northern meddling at a reelection campaign stop in Lamar County, where he warned that national reformers wanted “to send a Connecticut judge down here...to try you on an anti-lynching charge.”<sup>25</sup>

<sup>22</sup> Rhode Island, with a population of 637,000, cast 314,023 votes and elected 2 representatives, while Georgia, South Carolina, Mississippi, and Alabama, with a population of 9.3 million, cast 264,419 ballots and elected 32 representatives. *Poll Tax Repealer*, September 1942, p. 1.

<sup>23</sup> Richard B. Russell to Allen Reid, 4 February 1936, Series IV, Subseries B, Box 19, Folder 15, Richard B. Russell Papers, Richard B. Russell Library for Political Research and Studies, University of Georgia, Athens.

<sup>24</sup> *Congressional Record*, 75<sup>th</sup> Cong., 3<sup>rd</sup> Sess., 26 January 1938, p. 1102.

<sup>25</sup> “Georgia’s George Relies on Prejudice to Save His Seat,” New York *Amsterdam News*, 27 August 1938, A3.

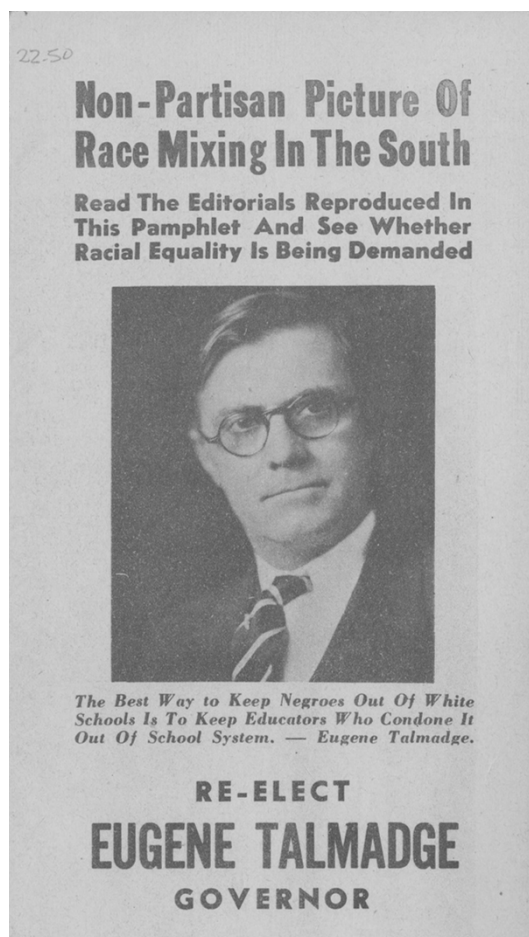


Figure 4: Talmadge campaign literature emphasized threats to racial segregation and the governor's commitment to maintain the embattled white primary. Courtesy Special Collections, McCain Library and Archives, University of Southern Mississippi.

By the start of World War II, white Georgians had neither shaken their allegiance to the Democratic Party nor forgotten the rationale for a one-party Solid South. However, from the earliest signs of Black political influence in national politics and the rather rapid defection of Black voters from the Republican Party, opponents of Black voting rights in Georgia openly debated their political positions—including defection from the Democratic Party. They also renewed calls for intimidation and violence to counter mounting attempts by Black Georgians to reclaim their constitutional right to the franchise.

### White Resistance to the Voting Rights Revolution (1944-1965)

Wartime change accelerated that process. Civil rights activists launched a “Double Victory” campaign to defeat totalitarianism abroad and racial discrimination at home. One victory with significant implications for racial politics and Black voting rights in Georgia was the 1944 *Smith v. Allwright* decision, in which the U.S. Supreme Court struck down the white primary as unconstitutional. That decision simultaneously fueled a voter registration drive in Georgia, spearheaded in many communities by returning Black veterans, and a surge in voter intimidation and violence. Former governor Eugene Talmadge, who had lost a bid for a fourth term in 1942 despite pledging to save the imperiled white primary, roared back in 1946 with a campaign strategy that simultaneously revived the

violent tactics of earlier generations with forward-looking strategies that previewed the voter suppression strategies of the post-civil rights era.

Georgia's campaign cycles in the late 1940s were the bloodiest and most inflammatory since the disfranchisement campaign at the turn of the century. During the 1946 primary season, a mob lynched two Black married couples at the Moore's Ford Bridge at the border of Walton and Oconee counties, allegedly in retaliation for the stabbing of a local white man. A few days after the primary, white vigilantes assassinated World War II veteran Maceo Snipes after he cast the lone Black ballot in Taylor County.<sup>26</sup> The violence compelled a seventeen-year-old Martin Luther King, Jr, then a student at Morehouse College, to pen a letter to the editor of the state's largest newspaper demanding “the basic rights and opportunities of American citizens.”<sup>27</sup>

<sup>26</sup> Carol Anderson, *One Person, No Vote: How Voter Suppression Is Destroying Our Democracy* (Bloomsbury Publishing, 2018), 15.

<sup>27</sup> M. L. King, Jr., “Letters to the Editor,” *The Atlanta Journal Constitution*, 6 August 1946.

APPLING

GEORGIA, \_\_\_\_\_ COUNTY

TO THE BOARD OF REGISTRARS OF SAID COUNTY:

Now comes the undersigned, citizens of said county, and challenges the right of registration of Minnie Dandridge, whose name appears upon the list of registered voters furnished by the tax collector to the Board of Registrars of said county, and files this contest as to the qualifications of said registered voter, and for ground of contest and challenge says;

1. Said registrant is not a citizen of this state and of the United States 18 years old or upwards, and will not be such citizen at the time of holding the general election in 1946.
2. Said registrant has not resided in the State of Georgia for one year next preceding the general election in 1946, and will not have so resided at the time of said general election.
3. Said registrant has not resided in APPLING county six months next preceding said general election and will not have so resided at the time of said general election.
4. Said registrant is not a person of good character who understands the duties and obligations of citizenship under a republican form of government.
5. Said registrant cannot correctly read in the English language any paragraph of the Constitution of the United States or of the State of Georgia and correctly write the same in such English language when read to said registrant by one of the registrars; and said registrant is not unable to comply with said requirements solely because of physical disability.
6. Said registrant cannot understand and give a reasonable interpretation of a paragraph of the constitution of the United States or of this state, when read to said registrant by any one of the registrars.

WHEREFORE, contestants and challengers pray that this board of registrars notify said registered voter of this challenge and contest and pass upon the same, and that a copy hereof be furnished to said registrant at least one day before the same is heard, and that if this contest and challenge be sustained, the name of said registrant be stricken from the list of voters and from the voters' book.

This, May \_\_\_\_\_, July 1, 1946

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Figure 5: The Talmadge campaign distributed thousands of challenge forms, like this sample from Appling County, to intimidate and disqualify Black voters in the 1946 Democratic primary. Courtesy NAACP Papers.

The 1946 primary reflected the persistent impact of racial violence and vote dilution on Georgia politics, as Talmadge won in a county-unit landslide despite losing the popular vote by more than fifteen thousand votes. Yet the inflammatory primary campaign also foreshadowed less overt voter suppression strategies. An extensive FBI investigation confirmed that Talmadge and his supporters blanketed the state with “challenge forms” that white voters could use to dispute Black votes. In Douglas County, members of a local “Talmadge club” distributed the forms to local white citizens who “knew the local negroes and knew which ones should be challenged.” Meanwhile, Talmadge telegraphed the tax commissioner in Rockdale County for lists of registered voters by race in a similar effort to identify and target Black voters for challenges.<sup>28</sup> Though both schemes proved unsuccessful, they demonstrated the willingness of candidates and local officials to collude in subtler suppression tactics that would attract less outside scrutiny—and eliminate more votes—than violent intimidation.

<sup>28</sup> Edward T. Kassinger, “Unknown Subjects: Racial Discrimination in Registration of Negro Voters, State of Georgia,” 24 October 1946, 128-31, 326-8, folder 1, file 44-114, Records of the Federal Bureau of Investigation, National Archives and Records Administration, College Park, Maryland; Joseph L. Bernd, “White Supremacy and the Disfranchisement of Blacks in Georgia, 1946,” *The Georgia Historical Quarterly* 66 (Winter 1982): 492-513.



The politics of voter exclusion continued to fuel Georgia politics in the next electoral cycle, as the late governor's son Herman Talmadge campaigned on a pledge to replace the outlawed white primary with "a primary just as white as we can get it."<sup>29</sup> Talmadge allies like Carroll County state representative Willis Smith endorsed this effort. "This is a white man's country," Smith declared, "and we must keep it that way."<sup>30</sup>

Although Black voter registration had surged in the wake of *Smith v. Allwright*, Talmadge's allies, including a resurgent Ku Klux Klan, spearheaded a campaign of voter suppression. Georgia Ku Klux Klan leader Samuel Green led a procession of 249 Klansmen through Wrightsville on the eve of the Johnston County primary. "Again you will see Yankee bayonets trying to force social and racial equality....," Green warned a crowd of 700 local white supporters. "If that happens there are those among you who will see blood flow in the streets." Although an estimated four hundred Black residents had registered to vote in Johnson County by March 1948, none showed up the next day to cast a ballot in the local primary.<sup>31</sup> In the months that followed, Talmadge supporters placed miniature coffins on the doorsteps of Black community leaders, scattered warning leaflets in Black neighborhoods, and, on primary day in Montgomery County, gunned down black World War II veteran Isaiah Nixon shortly after he cast a ballot.<sup>32</sup>

Following his election, Talmadge unveiled a four-point plan to purge the state's voter rolls and require re-registration every two years subject to a revived poll tax and a revamped "education requirement" that gave wide latitude to local officials to purge Black voters and reject new registrants. In one particularly blunt interpretation of the new registration rules, the Johnson County sheriff proposed that applicants sign a pledge in support of white supremacy. Historian Stephen G.N. Tuck estimates that nearly twelve thousand Black voters were purged "almost immediately" and thousands more failed to register under Talmadge's neo-disfranchisement regime.<sup>33</sup> Surging Black voter registration, which increased from 20,000 to 125,000 between 1940 to 1947, launched a white backlash to expanded voting rights. The pace of Black voter registration slowed significantly during the 1950s, although Black Georgians registered at rates well beyond neighboring states.<sup>34</sup>

Opponents of voting rights in Georgia placed the blame for relatively high Black registration on the "bloc" vote in Atlanta and smaller cities. From the 1940s through the 1960s, "bloc voting" meant "Black voting" for a succession of local and statewide candidates who rode racial backlash into office. In language that harkened back seventy-five years, Herman Talmadge argued that unless "an aroused White Southern electorate...halt and defeat this bloc voting," the region would "undergo a mid-Twentieth Century reconstruction period."<sup>35</sup> While Talmadge did little to veil his racial message, his political successors appreciated and accelerated their attacks on the "bloc"

<sup>29</sup> "Georgia Negroes Appeal to Courts as Dixiecrats Purge Voting Lists," *Chicago Defender*, 14 August 1948.

<sup>30</sup> *Carrollton Branch of the NAACP v. Stallings*, 829 F. 2d 1547 (11<sup>th</sup> Cir. 1987), 1551.

<sup>31</sup> "Sheet, Sugar Sack, and Cross," *Time*, 15 March 1948.

<sup>32</sup> Jason Morgan Ward, *Defending White Democracy: The Making of a Segregationist Movement and the Remaking of Racial Politics, 1936-1965* (University of North Carolina Press, 2011), 110-1; Jennifer E. Brooks, *Defining the Peace: World War II Veterans, Race, and the Remaking of Southern Political Tradition* (University of North Carolina Press, 2004), 161.

<sup>33</sup> Stephen G.N. Tuck, *Beyond Atlanta: The Struggle for Racial Equality in Georgia, 1940-1980* (University of Georgia Press, 2001), 76.

<sup>34</sup> Steven F. Lawson, *Black Ballots: Voting Rights in the South, 1944-1969* (Columbia University Press, 1976), 134.

<sup>35</sup> Herman Talmadge, *You and Segregation* (Birmingham: Vulcan Press, 1955), 25.



vote through less overt language. Georgia House Speaker and Troup County representative Fred Hand stressed the strategic importance of targeting the “ignorant bloc vote” rather than “negros” by name. “I like to think of it that way,” he explained, “instead of going into this color angle.”<sup>36</sup>

While Talmadge’s successors largely heeded this advice to play down the “color angle” in their resistance to voting rights, their response to *Brown v. Board* (1954) revealed the straight line they drew between black disfranchisement and the survival of racial segregation. Three years after the Supreme Court’s ruling on segregated schooling, the Georgia legislature voted unanimously to call for the repeal of the Fourteenth and Fifteenth Amendments. Legislators also took aim at the National Association for the Advancement of Colored People (NAACP), which Talmadge had blamed for controlling the “bloc vote.”<sup>37</sup> Just months after Georgia asked to invalidate two out of the three Reconstruction Amendments, the United States Congress passed the first civil rights act since Reconstruction. The Civil Rights Act of 1957, which included several modest voting protections, proved sufficiently threatening that Georgia’s legislature responded with yet another rewrite of its state election laws that included a revamped citizenship test, a “good character” provision, and a requirement that new voters register in person. All of these measures aimed to suppress the Black vote.<sup>38</sup>

By the end of the 1950s, voting rights opponents in Georgia agreed that the county unit system remained the strongest bulwark against Black political power. State senate president pro tempore and future governor Carl E. Sanders of Augusta argued that the system protected Georgia from “pressure groups or block votes” and remained essential for “maintaining conservative government and keeping liberals and radicals from taking over.”<sup>39</sup> Every Georgia governor of the civil rights era professed loyalty to the county-unit system, and its invalidation in *Gray v. Sanders* (1962) and the corresponding rejection of the state’s legislative apportionment by a U.S. District Court sent defenders of vote dilution scrambling.

Both the county unit system and legislative apportionment in Georgia inflated the power of rural counties and diluted the power of the urban “bloc vote” that defenders of white political power vilified.<sup>40</sup> In response to the “one person, one vote” precedent established in *Gray v. Sanders*, state legislators rallied behind a series of redistricting plans that included majority-vote requirement for local, state, and federal elections. This requirement, as Bibb County representative and self-proclaimed “county unit man” Denmark Groover argued in 1963, would “prevent special pressure groups from controlling elections.” Speaking candidly with his colleagues, Groover warned that a majority vote requirement was necessary to “thwart election control by negroes and other minorities.”<sup>41</sup>

The legislative scramble to preserve malapportionment and depress Black political power collided with grassroots voter registration drives and unprecedented federal action on civil rights. Buoyed by the Civil Rights Acts of 1960 and 1964, civil rights groups in Georgia helped to raise the

<sup>36</sup> Ward, *Defending White Democracy*, 111.

<sup>37</sup> McDonald, *Voting Rights Odyssey*, 71.

<sup>38</sup> McDonald, *Voting Rights Odyssey*, 72-4.

<sup>39</sup> J. Morgan Kousser, *Colorblind Injustice: Minority Voting Rights and the Undoing of the Second Reconstruction* (University of North Carolina Press, 1999), 204.

<sup>40</sup> McDonald, *Voting Rights Odyssey*, 84.

<sup>41</sup> McDonald, *Voting Rights Odyssey*, 12, 92.

stagnating voter registration rate from roughly a quarter of eligible Black voters in the early 1960s to just over sixty percent by decade's end.<sup>42</sup>

Civil rights activists persisted in the face of police harassment and vigilante violence—from burning Black churches and firing into Black homes at night to attacking civil rights workers in broad daylight. Low registration rates persisted in rural counties, including Jefferson, McDuffie, Warren, and thirty-one others, where less than ten percent of eligible Black voters had registered successfully by 1965. In Glascock County, for example, only *one* Black resident had successfully registered to vote despite the passage of three federal civil rights bills between 1957 and 1964.<sup>43</sup>

Local intransigence and violent resistance compelled the passage of the Voting Rights Act of 1965. The enactment of the most expansive voting rights protections since Reconstruction produced dramatic results on the ground. In Black-majority Burke County, for example, the number of registered Black voters had stalled out despite the series of civil rights bills passed between 1957 and 1964. Yet while the number of registered voters increased by only *two* (425 to 427) between 1958 and 1965, the number of registered Black voters surged to 2,760—from less than seven percent registered to nearly 42 percent of those eligible—in the two years following passage of the Voting Rights Act.<sup>44</sup>

### **Race, Redistricting, and the Rise of Republican Georgia (1964-2013)**

The dramatic upsurge in Black registration fractured and transformed the state's Democratic Party. This voting rights revolution also revived and reshaped an increasingly competitive Republican Party. The resurgent GOP's support base lay in the booming metropolitan suburbs rather than the rural counties that had dominated Georgia politics for decades, but the new Georgia Republicans shared with the old Georgia Democrats an opposition to urban political power, federal intervention, and—consequently—an expansive view of voting rights. Howard “Bo” Callaway, a former Democrat who switched parties in 1964 and became Georgia's first Republican congressman since Reconstruction, opposed the Voting Rights Act on the grounds that it could be “the first step” toward “complete Federal control” of local elections.<sup>45</sup>

Callaway, who owed his election to conservative presidential candidate Barry Goldwater's success in the Deep South in 1964, avoided the racist dog whistles of Georgia Democrats but lined up with them in support of literacy tests and other voting requirements long used to depress Black registration. In the 1966 midterms, Callaway won re-election and was joined in Congress by two Atlanta-area Republicans who replaced the only two Georgia Democrats who had voted for the Voting Rights Act the previous year. Fulton County's Fletcher Thompson, one of the first Republicans to win election to the Georgia Senate, took his fight against the “forced racial balance” to Congress, while DeKalb's Ben Blackburn pledged to protect the suburbs from “the

<sup>42</sup> Kousser, *Colorblind Injustice*, 201; Lawson, *Black Ballots*, 331.

<sup>43</sup> U.S. Commission on Civil Rights, *Political Participation: A Study of the Participation by Negroes in the Electoral and Political Processes in 10 Southern States Since Passage of the Voting Rights Act of 1965* (GPO, 1968), 232-9.

<sup>44</sup> McDonald, *Voting Rights Odyssey*, 10, 57; Commission on Civil Rights, *Political Participation*, 232-3.

<sup>45</sup> Hearings before Subcommittee No. 5 of the Committee on the Judiciary, House of Representatives, 89<sup>th</sup> Cong., 1<sup>st</sup> sess., H.R. 6400 and other Proposals to Enforce the 15<sup>th</sup> Amendment of the Constitution of the United States, March 18, 19, 24, 25, 29, 30, 31, and April 1, 1965, Serial No. 2, pp. 542-3.

welfare mother with her numerous kids” who “might be moved in next door” by federal public housing initiatives.<sup>46</sup>

Georgia’s “New Guard” Republicans couched their opposition to civil and voting rights initiatives in a language of limited government and personal freedom. Yet in a conscious bid to court disaffected Democrats, historian J. Morgan Kousser notes, they “shunned those blacks whom they did not entirely alienate.” In response to the segregationist “bloc vote” argument, which equated Black urban politics with corruption and irresponsibility, New Guard Republicans concluded they could “get along without the block [sic]” and offset votes lost among rapidly increasing Black registrants by wooing conservative white Democrats.<sup>47</sup>

This strategy proved quite successful, as a Republican platform of limited government, local control, and property rights resonated with arguments conservative Democrats in Georgia had made for decades. The racial and spatial continuities stood out as well as an overwhelmingly white Republican party, drawing its votes primarily from rural and suburban areas, squared off against the cities. As suburban Atlanta congressman Newt Gingrich argued, the Georgia Republicans “want safety, and they believe big cities have failed and are controlled by people who are incapable of delivering goods and services.”<sup>48</sup>

White Georgia legislators, including a growing number of Republicans, aimed their vote dilution strategies at the cities as well. Redistricting emerged as a favored tactic after the demise of the county-unit system. In the wake of the 1970 census, Georgia legislators submitted a number of redistricting plans that drew objections under Section 5 of the Voting Rights Act for “diluting black voting strength” in and around Atlanta.<sup>49</sup> Ten years later, redistricting proposals received federal scrutiny, particularly at the congressional level where legislators managed to create nine white-majority districts out of ten total seats. Although Black Georgians accounted for over a quarter of the state’s population in the 1980 census, white legislators—including Cobb County Democrat Joe Mack Wilson who lamented the prospect of more “nigger districts”—attempted to limit Black-majority districts to one-tenth of the state’s congressional delegation.<sup>50</sup>

Over the following three redistricting cycles, as the power balance shifted from Democrats to Republicans and the ideological alignment of each party solidified, Georgia’s redistricting plans continued to draw objections for their consistent tendency to dilute Black votes. Demographic change complicated those efforts, as the Black proportion of the state’s population grew from 26 percent in 1980 to over 30 percent in 2010. The spatial and racial equation of Black voting with urban politics persisted yet the primary driver of Black population growth in these decades was suburban. As the Black population of metropolitan Atlanta not only grew numerically but also expanded geographically, the suburbanization that fueled the rise of the Republican Party in the

<sup>46</sup> Kevin M. Kruse, *White Flight: Atlanta and the Making of Modern Conservatism* (Princeton University Press, 2007), 252-3.

<sup>47</sup> Kousser, *Colorblind Injustice*, 207.

<sup>48</sup> Peter Applebome, *Dixie Rising: How the South is Shaping American Values, Politics, and Culture* (Harcourt, Brace, and Co., 1996), 43-4.

<sup>49</sup> McDonald, *Voting Rights Odyssey*, 92.

<sup>50</sup> “Voting Rights: Evidence of Continued Need,” Hearing Before the Subcommittee on the Constitution of the Committee on the Judiciary, House of Representatives, 109<sup>th</sup> Cong. 2<sup>nd</sup> sess., March 8, 2006, Serial No. 109-103, vol. I, p. 111.

latter decades of the twentieth century had also transformed the racial and spatial dynamics of redistricting.<sup>51</sup>

### **Racial Appeals, Voter Suppression, and Twenty-First Century Political Violence**

Redistricting remained a powerful tool for voter dilution in the twenty-first century, but the Supreme Court's decision in *Shelby v. Holder* (2013) to invalidate Section 5's coverage formula also opened the door for increased voter restrictions. In the eight years since, Georgia officials enacted several measures, from changes to election dates and precinct locations to voter identification requirements and voter purges, that would have been more difficult before the *Shelby* decision. Indeed, some of these tactics more closely resemble suppression tactics from the Jim Crow era—voter purges and challenges, in particular—than the disfranchisement practices later targeted by the Voting Rights Act and other civil rights legislation in the 1950s and 1960s.

The rationale for these measures, which focuses on election fraud, traded in rhetoric that resonates with disfranchisement arguments of the past. For example, Richmond County legislator Sue Burmeister, an early and enthusiastic backer of voter identification measures, complained in 2005 that Black voters in her district's Black-majority precincts only showed up when they were “paid to vote.”<sup>52</sup> As in previous generations, while these measures remain race neutral on their face, their true impact is revealed by the racial appeals their supporters use to defend them. Nathan Deal, a former Democratic congressman turned Republican gubernatorial candidate, ridiculed criticism of voter ID measures as “the complaints of ghetto grandmothers who didn't have birth certificates” during his successful run for governor in 2009.<sup>53</sup>

Backers of voting restrictions also kept alive longstanding arguments about civic fitness and “education.” The year after the *Shelby* decision, DeKalb County representative Fran Millar criticized Sunday voting at a mall “dominated by African American shoppers and...near several large African American mega churches.” Aiming his comments at the south end of a metropolitan county transformed by Black suburbanization and immigration, Millar announced on social media, “I would prefer more educated voters than a greater increase in the number of voters.”<sup>54</sup>

The voter suppression campaign that picked up momentum in the wake of *Shelby* ran headlong into cultural and racial conflicts fueled by other demographic changes. While Georgia's Black population has grown significantly since 1980—after several decades of stagnation due to outmigration—other racial and ethnic minority populations have grown faster. The new racial politics reflect a diversifying population and fears of white decline. Responding to the demographic transformations that have reshaped Georgia into the South's most multicultural and metropolitan state, some gubernatorial candidates melded rhetoric of imperiled heritage, illegal immigration, and voter fraud into a potent blend. Most vocal was Michael Williams, a Forsyth County legislator who toured the state in a “deportation bus” and pledged to fight “liberal cities”

<sup>51</sup> Karen Pooley, “Segregation's New Geography: The Atlanta Metro Region, Race, and the Declining Prospects for Upward Mobility,” *Southern Spaces*, 15 April 2015, n.p.

<sup>52</sup> Anderson, *One Person, No Vote*, 60

<sup>53</sup> Aaron Gould Sheinin, “Deal Apologizes for ‘Ghetto’ Remark,” *Atlanta Journal-Constitution*, 6 October 2009.

<sup>54</sup> Hunter Schwarz, “Georgia State Senator Upset Over Efforts to Increase Voter Turnout in Black, Democratic Area,” *Washington Post*, 10 September 2014.

on immigration policies. Yet Williams, who represented a county where white mobs ran out most Black residents in a violent 1912 racial cleansing, showed more concern for the erasure of Confederate monuments and the “defacing of Stone Mountain”—the site of the Ku Klux Klan’s rebirth in 1915.<sup>55</sup>

For constituents who feel under siege in an era of tremendous demographic and cultural change, these racial appeals fuel support for a slew of strategies designed to preserve their political power and advantage. As in previous generations, those tactics are racial but also spatial, as former President Trump’s attacks on Atlanta officials and voters bear out. From his 2017 attack on voting rights icon John L. Lewis’ “crime infested” congressional district to unsubstantiated claims that Fulton County election officials fabricated tens of thousands of ballots, shredded “thousands and thousands” more, and forged “at least a couple hundred thousand” absentee ballot signatures in the 2020 presidential election, Trump revived an age-old tactic of targeting urban Georgia—and urban Georgians—as a uniquely unfit for governance.<sup>56</sup>

These claims matter because they demonstrate the historical link between voter suppression and political violence. To an extent not seen since the Reconstruction era, allegations of voter fraud and political corruption aimed primarily at Atlanta and metropolitan areas fueled the threat of blood flowing in the streets of the nation’s capital. Hundreds of armed rioters, including a Georgia-born man who entered the Senate Chamber with zip ties, a Henry County man who threatened Capitol police with death, and a Cobb County woman who died in the crowd crush, believed themselves to be part of a patriotic attempt to save their country. “We occupied the Capitol and shut down the Government,” bragged an attorney from Sumter County. “We shut down their stolen election shenanigans.”<sup>57</sup>

With the violent response to the 2021 election results, and the claims of malfeasance and corruption in Georgia, as pretext, diehard supporters of voter restrictions redoubled their efforts. In early 2021, Columbia County state representative Barry Fleming introduced House Bill 531, which ramped up restrictions on absentee ballots, early voting, and ballot drop boxes. These restrictions included restrictions on Sunday voting options that have historically boosted Black voter turnout.<sup>58</sup> Large portions of this bill were later incorporated into Senate Bill 202, a sweeping piece of legislation that was passed by the legislature and signed by the Governor in March of 2021.

That the renewed push for voting restrictions followed the most serious threat to a national election in more than a century demonstrates the ongoing link between racial appeals, voter intimidation, and policies that depress and dilute minority voting strength. The current redistricting effort must be understood not only in the context of Georgia’s longstanding history

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<sup>55</sup> Molly Olmstead, “Georgia Gubernatorial Candidate Begins ‘Deportation Bus’ Tour With Promise to ‘Fill This Bus With Illegals,’” *Slate*, 16 May 2018.

<sup>56</sup> Hope Yen, Jeff Amy, and Michael Balsamo, “AP FACT CHECK: Trump’s Made-Up Claims of Fake Georgia Votes,” *Associated Press*, 3 January 2021.

<sup>57</sup> Associated Press, “Georgia Man Arrested in Connection With Capitol Riot,” *US News and World Report*, 18 February 2021.

<sup>58</sup> Ben Nadler and Anila Yoganathan, “Georgia House Passes GOP Bill Rolling Back Voting Access,” *Associated Press*, 1 March 2021.



of racial violence, voter intimidation, and racial appeals, but also in the immediate context of an accelerated assault on voting rights.

## V. CONCLUSION

Racial intimidation of and violence against Black voters has a long history in Georgia, and no state has fought harder to limit the franchise since Reconstruction. Political campaigns in the state, as well as advocacy for voter restrictions by elected officials, have consistently relied on overt and subtle racial appeals to mobilize support. Historically, the politics of voting rights in Georgia has pitted state against nation, and rural against urban.

While no state has been more comprehensive and consistent in the use of voter suppression measures, the erosion of Black political power via redistricting has increased in strategic importance even as other disfranchisement and dilution tactics have been eliminated. The racial and spatial nature of voter suppression in Georgia, which equates Black politics with urban politics, malfeasance, and corruption, has resulted in volatile rhetoric and results from Reconstruction to the present.

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I reserve the right to modify and/or supplement my opinions, as well as to offer new opinions.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Respectfully submitted and executed on January 6, 2022.

A handwritten signature in blue ink, appearing to read "Jason Morgan Ward", is positioned above a horizontal line.

Dr. Jason Morgan Ward

## **APPENDIX A**

### **Curriculum Vitae**

#### **JASON MORGAN WARD**

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404-727-1505

#### **EDUCATION**

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##### **YALE UNIVERSITY**

Ph.D. in History, December 2008

Dissertation, "Saving Segregation: Southern Whites, Civil Rights, and the Roots of Massive Resistance, 1936-1954"

M.A., M.Phil in History, May 2006

##### **DUKE UNIVERSITY**

A.B. in History, with Distinction, 2001

#### **RESEARCH AND TEACHING INTERESTS**

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History of the United States Since Reconstruction; African American History; History of the American South; Violence and Extremism; Historical Memory

#### **SCHOLARSHIP**

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#### **PEER-REVIEWED PUBLICATIONS**

##### **Books**

*Hanging Bridge: Racial Violence and America's Civil Rights Century*. New York: Oxford University Press. New York: Oxford University Press, 2016.

Winner, Nonfiction Prize, Mississippi Institute of Arts and Letters, 2017

Winner, McLemore Prize, Mississippi Historical Society, 2017

*Defending White Democracy: The Making of a Segregationist Movement and the Remaking of Racial Politics, 1936-1965*. Chapel Hill: University of North Carolina Press, 2011.

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Winner, Everett E. Edwards Award, Agricultural History Society, 2007
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Chris Danielson, *After Freedom Summer: How Race Realigned Mississippi Politics, 1965-1986* (Gainesville: University Press of Florida, 2011) in *Journal of American Studies* 47 (February 2013): 291-2.

Glenn Feldman, ed., *Painting Dixie Red: When, Where, Why, and How the South Became Republican* (Gainesville: University Press of Florida, 2011) in *Journal of Southern History* 79 (February 2013): 221-3.

Tim S. R. Boyd, *Georgia Democrats, the Civil Rights Movement, and the Shaping of the New South* (Gainesville: University Press of Florida, 2012) in *Journal of American History* 99 (September 2012): 656-7.

Timothy J. Minchin and John A. Salmond, *After the Dream: Black and White Southerners Since 1965* (Lexington: University Press of Kentucky, 2011) in *Georgia Historical Quarterly* 95 (Summer 2012): 275-8.

John Howard, *Concentration Camps on the Home Front: Japanese Americans in the House of Jim Crow* (Chicago: University of Chicago Press, 2008) in *Journal of Southern History* 76 (February 2010): 197-9.

Paul Lombardo, *Three Generations, No Imbeciles: Eugenics, the Supreme Court, and Buck v. Bell* (Baltimore: Johns Hopkins University Press, 2008), and Michael Dorr, *Segregation's Science: Eugenics and Society in Virginia* (Charlottesville: University of Virginia Press, 2008) in *Virginia Magazine of History and Biography* 117 (2009): 302-4.

## PRESENTATIONS

### Invited Talks

"Getting the Most Out of Your Graduate Degree," Beyond CMU Speaker Series, Department of History, Central Michigan University, March 12, 2021.

"American Lynching: Testimony, Dialogue, and Memory," Candler School of Theology, Candler School of Theology, Emory University, February 6, 2019.

"Racial Violence, Migration, and Mississippi's Hanging Bridge," Oregon Historical Society, Portland, Oregon, April 13, 2018.

"The Swastika Entwined With Magnolia Blossoms: A Jewish Journalist Investigates Lynchings in the Wartime South," Holocaust Memorial Week, Oregon State University, Corvallis, April 12, 2018.

"Monuments to Judge Lynch: Race, Memory, and the Violence of White Supremacy," Drexel University, Philadelphia, Pennsylvania, January 18, 2018.

"Lifting the Veil: A Southern White Woman Goes Undercover in Jim Crow Mississippi," Summersell Center for the Study of the South, University of Alabama, Tuscaloosa, October 12, 2017.

"Migration, Civil Rights, and Mississippi's Hanging Bridge," Rapp Road Historical Association, Albany, New York, July 19, 2017.

"The First Federal Lynching Investigation in Mississippi History: Why It Failed and What It Can Teach Us," Osher Lifelong Learning Institute, University of Southern Mississippi, Hattiesburg, Mississippi, June 5, 2017.

"Hanging Bridge: Lessons in Testimony, Investigation, and Coalition," Banquet Keynote, Mississippi Historical Society, March 3, 2017.

"The Violence of Voter Suppression," Mississippi Freedom Project, Samuel Proctor Oral History Program-University of Florida, Delta State University, Cleveland, Mississippi, September 8, 2016.

"Racial Politics in Mississippi during World War II." History Is Lunch, Mississippi Department of Archives and History, Jackson, Mississippi, February 6, 2013.

"Mississippi, Manhattan, and the Racial Politics of World War II," Academic Lecture Series, St. John's University, Queens, New York, April 13, 2012.

"Racial Violence and Symbolic Death at Mississippi's Hanging Bridge," Colloquium in History and Culture, Drew University, Madison, New Jersey, April 12, 2012.



- "Memory and the Making of a Segregationist Movement," Gilder Lehrman Center for the Study of Slavery, Resistance, and Abolition, Yale University, New Haven, Connecticut, April 11, 2012.
- "Wanting the World to See: Mississippi's Hanging Bridge and the Wartime Politics of Racial Violence," Civil Rights and Restorative Justice Project, Northeastern University School of Law, Boston, Massachusetts, April 10, 2012.
- "Mississippi's Hanging Bridge and the Racial Politics of World War II," Millsaps Friday Forum, Millsaps College, Jackson, Mississippi, February 24, 2012.
- "Your County Could Be Next: Recovering the Deep South's Freedom Struggle," 2011 Black Belt Symposium, University of West Alabama, Livingston, Alabama, April 7, 2011.
- "Generational Narrative and the Civil Rights Century: The Case of Mississippi's Hanging Bridge," Triangle African American History Colloquium, University of North Carolina at Chapel Hill, January 28, 2011.

### **Conference Participation**

- "Reinterpreting Southern Histories: A Roundtable." Panelist, Annual Meeting of the Southern Historical Association, Louisville, Kentucky, November 8, 2019.
- "The Black Vote: Unraveling the History of an American Idea." A Celebration of Glenda Gilmore and Her Legacy, Yale University, New Haven, Connecticut, April 20, 2018.
- "When the Lynch Rope Fails, There Is Always the Draft': Racial Violence, Activist Families, and Grassroots Resistance in the Vietnam Era." Annual Meeting of the American Studies Association, Denver, Colorado, November 19, 2016.
- "There is a Revolution in Mississippi Today': Black Women, Federal Dollars, and White Backlash in the Civil Rights Era," Annual Meeting of the Mississippi Historical Society, Jackson, Mississippi, March 4, 2016.
- "Fifty Years since Lester Maddox: Georgia's Massive Resistance to the New Right." Panelist, Annual Meeting of the American Historical Association, Atlanta, Georgia, January 10, 2016.
- "The Mississippi Welfare League and the Origins of Racial Troubleshooting." Paper presented at the Annual Meeting of the Organization of American Historians, St. Louis, Missouri, April 17, 2015.
- "The Coming of Age: Race, Youth, and Politics in the Twentieth Century South." Panel Commentator, Annual Meeting of the Southern Historical Association, Atlanta, Georgia, November 14, 2014.
- "I Would Be Just Like the KKK Over There': Racial Violence, Draft Resistance, and the Mississippi Freedom Struggle." Paper presented at the Annual Convention of the Association for the Study of African American Life and History, Memphis, Tennessee, September 25, 2014.
- "Hunger and Poverty Politics in Mississippi's Ongoing Freedom Struggle." Paper presented at the Annual Meeting of the Agricultural History Society, Banff, Alberta, Canada, June 15, 2013.
- "Contesting Planter Law: Black Activism in Arkansas." Panel Chair and Commentator, Southern Labor Studies Association, New Orleans, Louisiana, March 9, 2013.

- "A 'Southern City' No More: White Supremacists, Civil Rights Activists, and D.C. Segregation, 1944-1956." Paper presented at the Annual Meeting of the American Historical Association, New Orleans, Louisiana, January 5, 2013.
- "Power, Poverty, and Peace: Mississippi's Grassroots Militants and the Summer of '66." Paper presented at The Fire Every Time: Reframing Black Power across the Twentieth Century and Beyond, Avery Research Center, College of Charleston, South Carolina, September 21, 2012.
- "The FEPC and the Making of a Segregationist Movement." Paper presented at the Annual Meeting of the Southern Historical Association, Baltimore, Maryland, October 30, 2011.
- "For Revolution's Sake': Grassroots Militancy, White Resistance, and the Meaning of Freedom in Rural Mississippi." Paper presented at the San Francisco State University Rights Conference, San Francisco, California, September 16, 2011.
- "Racial Capitalism, Free Enterprise, and the Political Economy of Massive Resistance," Paper presented at the Southern Industrialization Project Meeting, University of Southern Mississippi-Gulf Park Campus, Long Beach, Mississippi, June 5, 2011.
- "A Monument to Judge Lynch': Symbolic Death and Racial Resistance at Mississippi's Hanging Bridge." Paper presented at Dying, Mourning, and Memory in the American South: An Interdisciplinary Conference, North Carolina State University, Raleigh, North Carolina, April 1, 2011.
- "Caught Between Two Wars: Poverty Politics, Draft Resistance, and a Mississippi Family's Freedom Struggle." Paper presented at A Centennial Celebration of Civil Rights, University of Southern Mississippi, Hattiesburg, Mississippi, October 23, 2010.
- "The District of Columbia as a Segregationist Battleground, 1944-1963." Paper presented at the San Francisco State University Rights Conference, San Francisco, California, September 16, 2010.
- "The Grass Roots Problem: Elites, Everyday Southerners, and White Opposition to Civil Rights."* Paper presented at the Annual Meeting of the Organization of American Historians, Seattle, Washington, March 27, 2009.
- "The 1942 Shubuta Lynchings and the White South's 'Double V'." Paper presented at the Annual Meeting of the Southern Historical Association, New Orleans, Louisiana, October 11, 2008.
- "Archibald Rutledge's 'Negro Problem': Plantation Nostalgia and Civil Rights in the South Carolina Lowcountry." Paper presented at the Annual Meeting of the South Carolina Historical Association, Columbia, South Carolina, March 1, 2008.
- "'Nazis Hoe Cotton': Planters, POWs, and the Future of Farm Labor in the Deep South." Paper presented at World War II: After 60 Years, Siena College, Loudonville, New York, June 3, 2005.

## TEACHING

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### EMORY UNIVERSITY

- HIST 232: The Making of Modern America (introductory survey course)
- HIST 385: Terrorism in America (advanced undergraduate lecture course)
- HIST 488: Racial Violence in Modern America (advanced undergraduate seminar)
- HIST 495a: Introduction to Historical Interpretation (undergraduate honors thesis seminar)

HIST 585: Violence in American History (graduate readings course)

## **COURSES TAUGHT AT OTHER INSTITUTIONS**

### **Mississippi State University**

HI 1073: Modern U.S. History

HI 3343: Delta History Service & Experiential Spring Break

HI 3903: Historiography and Historical Methods

HI 4163: The United States, 1917-1945

HI 4173: The United States Since 1945

HI 4373: Modern Civil Rights Movement

HI 4493: Terrorism in America, 1865-2001

HI 8803: Graduate Colloquium: Violence in American History

HI 8823: Graduate Seminar in US History: 1877-present

HI 8823: Graduate Seminar in US History: Oral History Theory and Practice

HI 8963: Graduate Colloquium in United States History Since 1945

### **University of Pennsylvania**

HIST 231/AFRC 229: Racial Violence in Modern America (advanced undergraduate seminar)

### **Yale University**

HIST 449b: Mississippi and America (advanced undergraduate seminar)

## **THESES AND DISSERTATIONS DIRECTED**

### **Current Doctoral Students**

Amelia Golcheski (dissertation director)

Robert Billups (dissertation committee member)

Samuel Klee (external committee member, Universitetet i Oslo, Norway)

### **Senior Honors Theses Directed (Emory)**

Melanie Mills Dunn (2021)

Martin Pimentel (2020)

Christina Morgan (2019)

### **Dissertations Directed**

Michael Murphy, "Inhospitable in the Hospitality State: The Mississippi State Hospital in the Jim Crow South, 1865-1966" (2018)

Kevin Boland Johnson, "Guardians of Historical Knowledge: Textbook Politics, Conservative Activism, and School Reform in Mississippi, 1928-1982" (2014)

## **FELLOWSHIPS, HONORS, AND AWARDS**

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### **EXTERNAL**

Nonfiction Prize, Mississippi Institute of Arts and Letters, 2017

McLemore Prize (best book related to Mississippi history), Mississippi Historical Society, 2017

Mellon Postdoctoral Fellowship, Penn Humanities Forum, University of Pennsylvania, 2013-14

Sole runner-up, Allan Nevins Prize, Society of American Historians, 2009  
Finalist, C. Vann Woodward Dissertation Prize, Southern Historical Association, 2009  
Everett E. Edwards Award (best graduate student article), Agricultural History Society, 2007  
Ellison Durant Smith Research Award, Caroliniana Library, University of South Carolina, 2007  
Travel and Research Grant, Institute for Southern Studies, University of South Carolina, 2007  
Joel Williamson Visiting Scholar Grant, Southern Historical Collection, University of North Carolina at Chapel Hill, 2007

#### **INTERNAL**

University Nominee, Carnegie Corporation of America Fellows Program, Mississippi State University, 2016, 2017  
Dean's Eminent Scholar, College of Arts and Sciences, Mississippi State University, 2016  
William E. Parrish Outstanding Teaching Award, Department of History, Mississippi State University, 2013  
Carolyn S. Cobb Faculty Award for Excellence in Research, Teaching, and Service, Mississippi State University, 2011  
Humanities and Arts Research Program Fellow, College of Arts and Sciences, Mississippi State University, 2010  
Will Clark-State Pride Faculty Award for Excellence in Research, Teaching, and Service, Mississippi State University, 2010  
Ethnic Studies Affiliate, Program on Ethnicity, Race, and Migration, Yale University, 2006  
Hugh T. Lefler Award, Historical Society of North Carolina, best undergraduate paper, 2001  
William Laprade Prize, Department of History, Duke University, best honors thesis, 2001

#### **ACADEMIC POSITIONS**

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##### **EMORY UNIVERSITY**

Professor of History, Fall 2018-present

##### **MISSISSIPPI STATE UNIVERSITY**

Professor of History, Fall 2017-Fall 2018  
Associate Professor of History, Fall 2013-Spring 2017  
Assistant Professor of History, Fall 2008-Spring 2013

##### **UNIVERSITY OF PENNSYLVANIA**

Mellon Postdoctoral Fellow, Penn Humanities Forum, Fall 2013-Spring 2014

##### **YALE UNIVERSITY**

Part-Time Acting Instructor, Spring 2008.

#### **ACADEMIC AND PROFESSIONAL SERVICE**

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##### **TO THE PROFESSION**

Organization of American Historians

Member, 2022 Annual Meeting Program Committee, Spring 2020-present

Member, Committee on Committees, May 2018-Spring 2020

Southern Historical Association

Member, 2022 Annual Meeting Program Committee, Fall 2021-present

Board of Editors, *Journal of Southern History*, Fall 2019-present

Member, Membership Committee, Fall 2018-Spring 2020

Manuscript Referee for The Kent State University Press, Louisiana State University Press, Oxford

University Press, University of Arkansas Press, University of Georgia Press, University of

Nebraska Press, University of North Carolina Press, University Press of Mississippi

Article Referee for *Journal of Southern History*, *Modern American History*, *Journal of Civil and Human Rights*, *Journal of American Studies*, *Southern Spaces*, *Journal of Southern Religion*, *Virginia Magazine of History and Biography*, *Alabama Review*, *Journal of Mississippi History*

External Reviewer for Northwestern University, University of North Carolina at Chapel Hill,

Syracuse University, University of Texas-Rio Grande Valley, Millsaps College,

Faculty Collaborator, Civil Rights and Restorative Justice Project, Northeastern University School of Law, Boston, Massachusetts, Spring 2012-present

**TO THE UNIVERSITY**

**Emory University (Spring 2019-present)**

Member, President's Task Force on Untold Stories and Disenfranchised Populations, Spring 2021

Director of Graduate Studies, Department of History, Fall 2019-present

Member, Graduate Studies Committee, Department of History, Fall 2018-Spring 2019

**Mississippi State University (Fall 2008-Spring 2018)**

Faculty Associate, Center for the History of Agriculture, Science, and the Environment of the South (CHASES), Mississippi State University, Fall 2012-Spring 2018

Co-Creator, Course Designer, and Department Liaison, Delta Alternative Spring Break, Office of Student Leadership and Community Engagement, Spring 2012-Spring 2018

Chair, Promotion and Tenure Committee, Department of History, Mississippi State University, Fall 2017-Spring 2018

Member, Teaching Evaluation Committee, Mississippi State University, Fall 2014-Spring 2017

Member, Curriculum Committee, College of Arts and Sciences, Mississippi State University, Fall 2010-Spring 2013

**PROFESSIONAL MEMBERSHIPS**

American Historical Association

Organization of American Historians

Southern Historical Association



## **APPENDIX B**

### **Reliance Materials**

#### **Government Documents**

*Congressional Record*, 75<sup>th</sup> Congress, 3<sup>rd</sup> Session, 1938.

Hearings before Subcommittee No. 5 of the Committee on the Judiciary, House of Representatives, 89<sup>th</sup> Cong., 1<sup>st</sup> sess., H.R. 6400 and other Proposals to Enforce the 15<sup>th</sup> Amendment of the Constitution of the United States, March 18, 19, 24, 25, 29, 30, 31, and April 1, 1965, Serial No. 2.

Kassinger, Edward T. "Unknown Subjects: Racial Discrimination in Registration of Negro Voters, State of Georgia," 24 October 1946, 128-31, 326-8, folder 1, file 44-114, Records of the Federal Bureau of Investigation, National Archives and Records Administration, College Park, Maryland.

*South Carolina in 1876: Report on the Denial of the Elective Franchise in South Carolina at the State and National Election of 1876*. United States: United States Government Printing Office, 1877.

United States Commission on Civil Rights, *Political Participation: A Study of the Participation by Negroes in the Electoral and Political Processes in 10 Southern States Since the Passage of the Voting Rights Act of 1965*. Washington, D.C.: United States Government Printing Office, 1968.

"Voting Rights: Evidence of Continued Need," Hearing Before the Subcommittee on the Constitution of the Committee on the Judiciary, House of Representatives, 109<sup>th</sup> Cong. 2<sup>nd</sup> sess., March 8, 2006, Serial No. 109-103, vol. I.

#### **Legal Records**

*Carrolton Branch of the NAACP v. Stallings*, 829 F. 2d 1547 (11<sup>th</sup> Cir. 1987)

#### **Manuscript Collections**

Papers of the National Association for the Advancement of Colored People. Library of Congress, Washington, District of Columbia.

Richard B. Russell Papers, Richard B. Russell Library for Political Research and Studies, University of Georgia, Athens.

Talmadge Pamphlets, Special Collections, McCain Library and Archives, University of Southern Mississippi, Hattiesburg, Mississippi.

### **Published Primary Sources**

*Life and Labors of Henry W. Grady: His Speeches, Writings, Etc.* New York: H.C. Hudgins and Co, 1890.

Talmadge, Herman. *You and Segregation*. Birmingham: Vulcan Press, 1955.

### **Newspapers, Periodicals, and Websites**

“A Negro Lynched,” *New York Times*, 23 July 1889, 1.

Associated Press, “Georgia Man Arrested in Connection With Capitol Riot,” *US News and World Report*, 18 February 2021.

“Crime,” *The Crisis* 18 (July 1919): 155.

“Georgia Negroes Appeal to Courts as Dixiecrats Purge Voting Lists,” *Chicago Defender*, 14 August 1948, 1-2.

“Georgia’s George Relies on Prejudice to Save His Seat,” [New York] *Amsterdam News*, 27 August 1938, A3.

“Hon. Thos. Hardwick Addresses Convention,” *Atlanta Constitution*, 5 September 1906, 2.

King, Jr., M. L., “Letters to the Editor,” *The Atlanta Journal Constitution*, 6 August 1946.

Nadler, Ben, and Anila Yoganathan, “Georgia House Passes GOP Bill Rolling Back Voting Access,” *Associated Press*, 1 March 2021.

“Negro Lynching by Georgia Mob,” *New York Times*, 19 February 1918, 6.

“North Carolina’s Sweet Womanhood Appeals to the Ballot for Protection,” *Atlanta Constitution*, 2 October 1898, 5.

Olmstead, Molly. “Georgia Gubernatorial Candidate Begins ‘Deportation Bus’ Tour With Promise to ‘Fill This Bus With Illegals’,” *Slate*, 16 May 2018.

*Poll Tax Repealer*, September 1942, 1.

Schwarz, Hunter. “Georgia State Senator Upset Over Efforts to Increase Voter Turnout in Black, Democratic Area,” *Washington Post*, 10 September 2014.

“Sheet, Sugar Sack, and Cross,” *Time*, 15 March 1948.

Sheinin, Aaron Gould. “Deal Apologizes for ‘Ghetto’ Remark,” *Atlanta Journal-Constitution*, 6 October 2009

“Text of the Platform Adopted by the Democratic Convention,” *Atlanta Constitution*, 5 September 1906, 6.

“The Georgia Election,” *Harpers Weekly*, 19 October 1872, 833.

White, Walter F. “The Work of a Mob,” *The Crisis* 16 (September 1918): 221-3.

Yen, Hope, Jeff Amy, and Michael Balsamo, “AP FACT CHECK: Trump’s Made-Up Claims of Fake Georgia Votes,” *Associated Press*, 3 January 2021.

### **Books and Articles**

Anderson, Carol. *One Person, No Vote: How Voter Suppression Is Destroying Our Democracy*. New York: Bloomsbury Publishing, 2018.

Applebome, Peter. *Dixie Rising: How the South is Shaping American Values, Politics, and Culture*. New York: Harcourt, Brace, and Co., 1996.

Bartley, Numan V. *The Creation of Modern Georgia*. Athens: University of Georgia Press, 1990.

Bernd, Joseph L. “White Supremacy and the Disfranchisement of Blacks in Georgia, 1946.” *The Georgia Historical Quarterly* 66 (Winter 1982): 492-513.

Brooks, Jennifer E. *Defining the Peace: World War II Veterans, Race, and the Remaking of Southern Political Tradition*. Chapel Hill: The University of North Carolina Press, 2004.

Brown-Marshall, Gloria J. *The Voting Rights War: The NAACP and the Ongoing Struggle for Justice*. New York: Rowman and Littlefield, 2016.

Boyd, Tim S. R. *Georgia Democrats, the Civil Rights Movement, and the Shaping of the New South*. Gainesville: University Press of Florida, 2012.

Brundage, W. Fitzhugh. *Lynching in the New South: Georgia and Virginia, 1880-1930*. Urbana and Chicago: University of Illinois Press, 1993.

Dray, Philip. *At the Hands of Persons Unknown: The Lynching of Black America*. New York: Modern Library, 2003.

Du Bois, W.E.B. *Black Reconstruction in America*. New York: Russell and Russell, 1935.

Emberton, Carole. *Beyond Redemption: Race, Violence, and the American South After the Civil War*. Chicago: University of Chicago Press, 2013.

Feimster, Crystal. *Southern Horrors: Women and the Politics of Rape and Lynching*. Harvard University Press, 2009.

- Foner, Eric. *A Short History of Reconstruction, 1863-1877*. New York: Harper Perennial, 1990.
- Formwalt, Lee W. "The Camilla Massacre of 1868: Racial Violence as Political Propaganda." *The Georgia Historical Quarterly* 71 (Fall 1987): 399-426.
- Freeman, David B. *Carved in Stone: The History of Stone Mountain*. Macon, Ga: Mercer University Press, 1997.
- Godshalk, David Fort. *Veiled Visions: The 1906 Atlanta Race Riot and the Reshaping of American Race Relations*. Chapel Hill: University of North Carolina Press, 2005.
- Grantham, Dewey W. "Georgia Politics and the Disfranchisement of the Negro, *The Georgia Historical Quarterly* 32 (March 1948): 1-21.
- Kousser, J. Morgan. *Colorblind Injustice: Minority Voting Rights and the Undoing of the Second Reconstruction*. Chapel Hill: University of North Carolina Press, 1999.
- . *The Shaping of Southern Politics: Suffrage Restriction and the Establishment of the One-Party South, 1880-1910*. New Haven: Yale University Press, 1974.
- Korobkin, Russell. "The Politics of Disfranchisement in Georgia," *The Georgia Historical Quarterly* 74 (Spring 1990): 20-58.
- Kruse, Kevin M. *White Flight: Atlanta and the Making of Modern Conservatism*. Princeton: Princeton University Press, 2007.
- Lawson, Steven F. *Black Ballots: Voting Rights in the South, 1944-1969*. New York: Columbia University Press, 1976.
- McDonald, Laughlin. *A Voting Rights Odyssey: Black Enfranchisement in Georgia*. Cambridge: Cambridge University Press, 2003.
- McWhirter, Cameron. *Red Summer: The Summer of 1919 and the Awakening of Black America*. New York: Henry Holt and Company, 2011.
- Perman, Michael. *Struggle for Mastery: Disfranchisement in the South, 1888-1908*. Chapel Hill: University of North Carolina Press, 2001.
- Pooley, Karen. "Segregation's New Geography: The Atlanta Metro Region, Race, and the Declining Prospects for Upward Mobility," *Southern Spaces*, 15 April 2015 [n.p., online]
- Riser, R. Volney. *Defying Disfranchisement: Black Voting Rights Activism in the Jim Crow South, 1890-1908*. Baton Rouge: Louisiana State University Press, 2013.
- Tolnay, Stewart Emory and E. M. Beck. *A Festival of Violence: An Analysis of Southern*

- Lynchings, 1882-1930*. Urbana: University of Illinois Press, 1995.
- Tuck, Stephen G. N. *Beyond Atlanta: The Struggle for Racial Equality in Georgia, 1940-1980*. Athens: University of Georgia Press, 2001.
- Ward, Jason Morgan. *Defending White Democracy: The Making of a Segregationist Movement and the Remaking of Racial Politics, 1936-1965*. Chapel Hill: The University of North Carolina Press, 2011.
- Williams, Kidada E. *They Left Great Marks on Me: African American Testimonies of Racial Violence from Emancipation to World War I*. New York: New York University Press, 2012.
- Woodward, C. Vann. *Tom Watson: Agrarian Rebel*. New York: MacMillan, 1938.

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# EXHIBIT F

RETRIEVED FROM DEMOCRACYDOCKET.COM

**DECLARATION OF KATIE BAILEY GLENN**

My name is Katie Bailey Glenn and I am over the age of 18 and fully competent to make this declaration. Under penalty of perjury, I state the following:

1. I live at 140 Greenway Park Drive, McDonough, Georgia, 30253 with my son. I thus reside in State Senate District 17 under the new State Senate map recently adopted by the State.
2. I am African-American.
3. I was born and raised in Macon, Georgia but moved to McDonough, Georgia in the 1960s, and have lived here ever since. I have lived at the Greenway Park Drive address for over 50 years and I am registered to vote at that address.
4. I am politically engaged and have voted consistently for years, including in elections for State Senate and State House.
5. I have a Master's degree in Education.
6. I served as a schoolteacher for over 35 years, and taught English and French. I retired in 1977.

7. In addition to my teaching duties, I also worked with the State of Georgia and helped to certify new teachers before my retirement.
8. I currently volunteer with the Henry County Retired Teachers' Association.
9. I am an active member of my church, Wesley Chapel United Methodist Church.
10. I am concerned about the fairness of the redistricting process in the State of Georgia. I believe that the way that the lines have been drawn in the redistricting process is unfair and does not give everyone a voice in the political process. I think this is especially true for African American voters like myself.
11. I declare under penalty of perjury that the foregoing is true and correct.

DATED this 12 day of December, 2021.

By: Katie Bailey Glenn

Katie Bailey Glenn



# EXHIBIT G

RETRIEVED FROM DEMOCRACYDOCKET.COM

**DECLARATION OF PHIL S. BROWN**

My name is Phil S. Brown and I am over the age of 18 and fully competent to make this declaration. Under penalty of perjury, I state the following:

1. I live at 18174 U.S. Highway 1 N., Wrens, Georgia 30833 with my two grandchildren. I thus reside in State Senate District 23 under the new State Senate map recently adopted by the State.
2. I am African-American.
3. I was born and raised in Wrens, GA, and have lived here all my life. I am registered to vote at the U.S. Highway 1 N. address.
4. I am politically engaged and have voted consistently for years, including in elections for State Senate and State House.
5. I intend to vote in the next election for State Senate and State House.
6. I have served as a poll worker and poll manager in my community for over 10 years.
7. I am currently retired, but was a factory worker before retirement.
8. I am an active member of the AME Church, and worship at the Lofton Circuit AME Church in Wrens, Georgia.
9. I also serve as the Steward Pro Tem at the Lofton Circuit AME Church.



10. I believe that the redistricting process should be fair to all voters, regardless of the color of their skin or their income level. I am concerned because I believe that African American voices will not be reflected in a fair way by the lines that the State has drawn.

11. I declare under penalty of perjury that the foregoing is true and correct.

DATED this 28 day of Dec., 2021.

By: Phil S. Brown

Phil S. Brown

RETRIEVED FROM DEMOCRACYDOCKET.COM

# EXHIBIT H

RETRIEVED FROM DEMOCRACYDOCKET.COM

**DECLARATION OF JANICE STEWART**

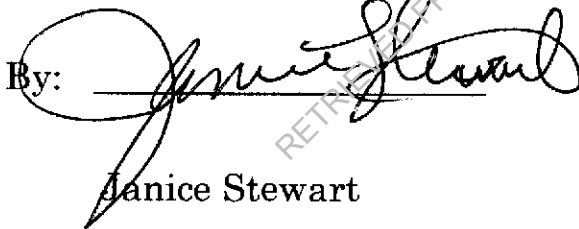
My name is Janice Stewart and I am over the age of 18 and fully competent to make this declaration. Under penalty of perjury, I state the following:

1. I live at 2313 Cassidy Road, Thomasville, GA 31792 with my husband and daughter. I thus reside in State House District 173 under the new State House map recently adopted by the State.
2. I am African-American.
3. I was born and raised in Mitchell County, Georgia but moved to Thomas County, Georgia about 30 years ago, and have lived here ever since. I have lived at the Cassidy Road address for about 30 years and I am registered to vote at that address.
4. I am politically engaged and have voted consistently for years, including in elections for State Senate and State House.
5. I intend to vote in the next election for State Senate and State House.
6. I have earned a number of degrees, including a Master's in Business Administration (MBA) and a Master's in

Management. I currently work as a senior administrative assistant at a large company.

7. I am an active member of my church, Saint Peter AME Church, Camilla.
8. I believe that redistricting should be done in a way that is fair to all voters. I know that redistricting has a big impact on my community, and an unfair redistricting process can affect voters in my community for many years.
9. I declare under penalty of perjury that the foregoing is true and correct.

DATED this 29<sup>th</sup> day of December, 2021.

By:   
Janice Stewart

# EXHIBIT I

RETRIEVED FROM DEMOCRACYDOCKET.COM



**DECLARATION OF ERIC T. WOODS**

My name is Eric T. Woods and I am over the age of 18 and fully competent to make this declaration. Under penalty of perjury, I state the following:

1. I live at 285 Park Haven Lane, Tyrone, GA 30290 with my wife and three children. I thus reside in State Senate District 16 under the new State Senate map recently adopted by the State.
2. I am African-American.
3. I was born and raised in Detroit, Michigan but moved to Fayette County, Georgia in 2008, and have lived here ever since. I have lived at the Park Haven Lane address for about 10 years and I am registered to vote at that address.
4. I am politically engaged and have voted consistently for years, including in elections for State Senate and State House.
5. I intend to vote in the next election for State Senate and State House.
6. I earned a Master's Degree in 1999.
7. I previously served in the army for 26 years.
8. I care deeply about my community and about the fairness of the redistricting process. I believe that the redistricting process should have been fairer to members of my community, including the African American community.
9. I declare under penalty of perjury that the foregoing is true and correct.

DATED this 29 day of DECEMBER 2021.

By: Eric T. Woods  
Eric T. Woods

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# EXHIBIT J

RETRIEVED FROM DEMOCRACYDOCKET.COM

ALPHA PHI ALPHA FRATERNITY  
INC., *et al.*,

*Plaintiffs,*

vs.

BRAD RAFFENSPERGER, in his  
official capacity as Secretary of State  
of Georgia.

*Defendant.*

**DECLARATION OF SHERMAN LOFTON, JR., ON BEHALF OF ALPHA  
PHI ALPHA FRATERNITY INC.**

My name is Sherman Lofton, Jr. I am over the age of twenty-one (21) years of age and am fully competent to execute this Declaration. I have knowledge of the facts recited here, which are true and correct, and are based on my personal knowledge. Under penalty of perjury, I state the following:

1. I am the Georgia District Director of Alpha Phi Alpha Fraternity Inc. (“Alpha Phi Alpha”), the Nation’s oldest Black fraternity. Alpha Phi Alpha is a Plaintiff in this action.

2. Alpha Phi Alpha is the first intercollegiate Greek-letter fraternity established for Black Men. The organization was founded in 1906 at Cornell University in Ithaca, New York.

3. I have been involved with Alpha Phi Alpha since 1995, and served in various leadership roles prior to serving as Georgia District Director beginning in 2019. I have served on the Georgia District Board of Directors since 1996. Through my prior leadership positions in Alpha Phi Alpha, I supervised our programming and chapters in the metro Atlanta region, including Cobb, Henry, Spalding, and Coweta counties.

4. As Georgia District Director, I support the initiatives and programming of the Regional Vice President with Alpha Phi Alpha's Georgia chapters. In addition to overseeing initiatives, programs, projects, and intakes, I am the lead representative for the Georgia District Association and serve as a spokesperson for the fraternity in the State.

5. Alpha Phi Alpha has over 3,000 members across Georgia. Many of these members are Black Georgians who are registered voters. Members of our organization live in every region of the State, including in Metro Atlanta, Augusta and the surrounding counties, Southwestern Georgia (including the counties around Columbus and Albany), and other counties across the state.

6. Specifically, members of our organization live in and around new Georgia Senate Districts 16 and 17 and the newly-drawn House Districts drawn in those same areas, including House Districts 74, 114, 117, and 134, including, without limitation, in Fayette County, Spalding County, Henry County, Newton County, and other counties in the area. For example, one of our members, Brother Harry Mays, resides in House District 117.

7. Our members also live in and/or around the area that comprises new Georgia Senate District 23 (as well as the new House Districts drawn in and/or around the same area, such as House Districts 128 and 133), including, without limitation, in Richmond County (which includes Augusta) as well as various nearby counties, such as Burke County, Jefferson County, and Baldwin County.

8. Alpha Phi Alpha also has members living in and/or around the area that comprises new Georgia House Districts 171 and 173 (as well as other new House Districts drawn in and/or around the same area), including, without limitation, in Dougherty County (which includes Albany) as well as various nearby counties, including, among a number of others, Mitchell County and Thomas County.

9. Members of Alpha Phi Alpha in the Georgia District include Black registered voters who I understand reside in the new State Senate and State House districts discussed above, but who would reside in the illustrative



additional majority-Black State Senate and State House districts presented by Plaintiffs in this case that could have and should have been drawn in the above-discussed areas.

10. Alpha Phi Alpha has historically made raising the civic participation of its members and Black Americans an organizational priority. Beginning in the 1930s, Alpha Phi Alpha created a National Program called “A Voteless People is a Hopeless People,” which seeks to enhance Black civic participation and voting. Through the “A Voteless People is a Hopeless People” National Program, Alpha Phi Alpha focuses on voter education, registration, civic awareness, and empowerment.

11. The Georgia District is one of the most active segments of the fraternity in community engagement. The District prioritizes social justice, voter enfranchisement, criminal justice, education, and anti-poverty initiatives in its activities. With additional representation in the State legislature, Black voters in Georgia could exert more political pressure on our state government to address systemic inequality and continuing discrimination in these areas, particularly when it comes to voting rights, criminal justice, the school-to-prison pipeline, and educational resources.

12. Alpha Phi Alpha actively registers voters through its “First of All, We Vote” initiative, holds events to raise political awareness and empower Black

communities, and fights efforts to diminish Black political power. The Georgia District of Alpha Phi Alpha has advocated at the state capitol for legislation that expands voting rights for all Georgians and regularly works in local communities to register voters and educate them on their rights.

13. The new maps directly affect those efforts by undermining the ability of Black Georgians, including members of Alpha Phi Alpha, to elect representatives of their choice.

14. On August 11, 2021, I provided public comments on behalf of Georgia members of Alpha Phi Alpha at a redistricting town hall convened by members of the Georgia legislature in Augusta, Georgia. At the town hall, I asked the Chairs of the Redistricting Committees in the House and Senate to make sure that people of color had a voice in the redistricting process. I also asked that the legislature draw maps in a way that is fair and transparent, because the redistricting process would affect the lives of so many Georgians.

15. Georgia's minority population, especially among Black Georgians, has grown over the past decade and drives Georgia's economic growth and national prominence. I have observed this growth and change firsthand as a resident of Henry County, which has both grown in population and become increasingly diverse over the past decade. In my observation, this growth is being driven in part by Black citizens from the larger Atlanta metro, as well as

from around the country, moving to Henry County, deepening the ties of the County's growing Black community to that of the broader region.

16. The proposed Georgia State and House maps do not reflect the growth of the State's minority population, especially in the metro Atlanta area.

17. If the new maps take effect, Alpha Phi Alpha will be forced to divert resources from its voter education and registration programming to the affected districts in order to protect the representation and interests of its members in the community.

18. I declare under the penalty of perjury that the foregoing is true and correct.

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Dated this 28<sup>th</sup> day of December, 2021,

By: /s/ Reginald T. Jackson

Reginald T. Jackson

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# EXHIBIT K

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ALPHA PHI ALPHA FRATERNITY  
INC., *et al.*,

*Plaintiffs,*

vs.

BRAD RAFFENSPERGER, in his  
official capacity as Secretary of State  
of Georgia.

*Defendant.*

**DECLARATION OF BISHOP REGINALD T. JACKSON, ON BEHALF OF  
THE SIXTH DISTRICT OF THE AFRICAN METHODIST EPISCOPAL  
CHURCH**

My name is Reginald T. Jackson. I am over the age of twenty-one (21) years of age and am fully competent to execute this Declaration. I have knowledge of the facts recited here, which are true and correct, and are based on my personal knowledge. Under penalty of perjury, I state the following:

1. I am the presiding prelate of the Sixth Episcopal District of the African Methodist Episcopal Church ("AME Church"). The Sixth District is one of twenty districts of the AME Church and covers the entirety of the State of Georgia. The Sixth District of the AME Church is a Plaintiff in this action.

2. I was elected and consecrated the 132nd bishop of the AME Church in 2012, and have served in this position for nine years. I have served as the chairman of the Social Action Commission of the AME Church and am the current chairman of the Commission on Colleges, Universities and Seminaries.

3. The AME Church traces its roots to 1816 as the first independent Protestant denomination founded by Black people in response to segregation and discrimination in the Methodist Episcopal Church.

4. The AME Church places a strong emphasis on social service. In addition to its primary mission of religious education, AME Church has a secondary mission of service to the homeless, the imprisoned, the poor, and other needy persons.

5. Encouraging and supporting civic participation among its members is a core aspect of the AME Church's work. Advocating for the right to vote, regardless of candidate or party, and encouraging the AME Church's eligible members to vote have been priorities of the Church.

6. AME Church's activities in support of voter participation reflect the history of the civil rights march from Selma to Montgomery in Alabama. The march was organized in and began at the steps of Brown Chapel AME Church in Selma. After they were beaten by Alabama State Troopers on the Edmund

Pettus Bridge on “Bloody Sunday,” the wounded marchers fled back to the sanctuary of Brown Chapel.

7. The AME Church continues to encourage civic participation by holding “Souls to the Polls” events to transport churchgoers to polling locations during advance voting periods, registering voters for elections, hosting “Get Out the Vote” efforts to increase voter turnout, and providing food, water, encouragement, and assistance to voters waiting in lines at polling locations. Advancing voting rights and eliminating barriers to political participation that have plagued the promise of full citizenship for Black Americans since this country’s founding is a core issue that ties our members—and the communities in which they live—together.

8. There are more than 500 member-churches that are part of the Sixth District of the AME Church in Georgia. There are 36 congregations in Atlanta alone. The AME Church, the District, and our individual congregations serve as key community institutions, connecting members locally and throughout the State and its regions, fostering dialogue and fellowship, and maintaining the vibrancy and interconnectedness of our communities.

9. AME Church’s membership includes tens of thousands of Black Georgians who are registered voters, including in Metro Atlanta, Augusta and the surrounding counties, Southwestern Georgia (including the counties in and

around Columbus and Albany), and other counties across the state. Several congregants are named Plaintiffs in this case.

10. There are approximately 60 congregations located in and around the areas that comprise new Georgia Senate Districts 16 and 17 (as well as the new House Districts drawn in and/or around the same areas, such as House Districts 74, 114, 117, and 134), including, without limitation, in Fayette County, Spalding County, Henry County, Newton County, and other counties in the area. Many, if not all, of these churches have congregants who identify as Black and who are residents and registered voters in or around Georgia Senate Districts 16 and 17 (as well as the new House Districts drawn in and/or around the same areas, such as House Districts 74, 114, 117, and 134).

- a. For example, Cleveland Chapel AME Church, located in new Senate District 17, is one of our member congregations in Hampton, Georgia. Cleveland Chapel AME is in southwestern Henry County, in the Metro Atlanta area, where the population of Black Georgians has grown significantly over the past decade.
- b. For another example, Rising Star Missionary Baptist Church, located in Senate District 16, is one of our member congregations in Griffin, Georgia. Rising Star Missionary Baptist is in southwestern Spalding

County, just on the outskirts of Metro Atlanta, where the population of Black Georgians has also grown since 2010.

11. Numerous AME churches are also located in and around the area that comprises new Georgia Senate District 23 (as well as the new House Districts drawn in and/or around the same area, such as House Districts 128 and 133), including, without limitation, in Richmond County (which includes Augusta) as well as various nearby counties, such as Burke County, Jefferson County, and Baldwin County. These churches also have congregants who identify as Black and who are residents and registered voters in or around Georgia Senate Districts 23 (as well as the new House Districts drawn in and/or around the same areas, such as House Districts 128 and 133).

a. For example, Spring Bethel AME Church, located in Senate District 23, is one of our member congregations in Louisville, Georgia.

Spring Bethel AME Church is located in Jefferson County.

b. Flipper Chapel AME Church, located in House District 133, is one of our member congregations in Milledgeville, Georgia. Flipper Chapel AME is in central Baldwin County.

12. There are also numerous AME churches established in and around the area that comprises new Georgia House Districts 171 and 173 (as well as other new House Districts drawn in and/or around the same area), including, without



limitation, in Dougherty County (which includes Albany) as well as various nearby counties, including, among a number of others, Mitchell County and Thomas County. These churches also have congregants who identify as Black and who are residents and registered voters in or around Georgia House Districts 171 and 173.

- a. For example, St. Peter AME Church, located in House District 171, is one of our member congregations in Camilla, Georgia. St. Peter AME is in Mitchell County, a part of southwest Georgia.

13. Members of AME Church include Black registered voters who I understand reside in the new State Senate and State House districts discussed above , but who would reside in the illustrative additional majority-Black State Senate and State House districts presented by Plaintiffs in this case that could have and should have been drawn in the above-discussed areas .

14. The new maps directly affect AME Church's advocacy efforts by undermining the ability of Black Georgians, including the Church's members, to elect representatives of their choice.

15. AME Church will be forced to divert resources from its broader voter registration and community empowerment initiatives to areas where Black voting strength has been unlawfully watered down in order to protect the representation and interests of its members.

16. I declare under penalty of perjury that the foregoing is true and correct.

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Dated this 31<sup>st</sup> day of December, 2021,

By: /s/ [Signature]

Sherman Lofton, Jr.

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# EXHIBIT L

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## **2021-2022 GUIDELINES FOR THE HOUSE LEGISLATIVE AND CONGRESSIONAL REAPPORTIONMENT COMMITTEE**

### **I. HEARINGS AND MEETINGS**

#### **A. PUBLIC HEARINGS**

1. A series of public hearings were held to actively seek public participation and input concerning the General Assembly's redrawing of congressional and legislative districts.
2. Video recordings of all hearings are and shall remain available on the legislative website, [www.legis.ga.gov](http://www.legis.ga.gov)

#### **B. COMMITTEE MEETINGS**

1. All formal meetings of the full committee will be open to the public.
2. When the General Assembly is not in session, notices of all such meetings will be posted at the Offices of the Clerk of the House or Secretary of the Senate and other appropriate places at least 24 hours in advance of any meeting. Individual notices may be transmitted by email to any citizen or organization requesting the same without charge. Persons or organizations needing this information should contact the Senate Press Office or House Communications Office or the Secretary of the Senate or Clerk of the House to be placed on the notification list.
3. Minutes of all such meetings shall be kept and maintained in accordance with the rules of the House and Senate. Copies of the minutes should be made available in a timely manner at a reasonable cost in accordance with these same rules.

### **II. PUBLIC ACCESS TO REDISTRICTING DATA AND MATERIALS**

- A. Census information databases on any medium created at public expense and held by the Committee or by the Legislative and Congressional Reapportionment Office for use in the redistricting process are included as public records and copies can be made available to the public in accordance with the rules of the General Assembly and subject to reasonable charges for search, retrieval, reproduction and other reasonable, related costs.
- B. Copies of the public records described above may be obtained at the cost of reproduction by members of the public on electronic media if the material exists on an appropriate electronic medium. Cost of reproduction may include not only the medium on which the copies made, but also the labor cost for the search, retrieval, and reproduction of the records and other reasonable, related costs.



- C. These guidelines regarding public access to redistricting data and materials do not apply to plans or other related materials prepared by or on behalf of an individual Member of the General Assembly using the Legislative and Congressional Reapportionment Office, where those plans and materials have not been made public through presentation to the Committee.

### **III. REDISTRICTING PLANS**

#### **A. GENERAL PRINCIPLES FOR DRAFTING PLANS**

1. Each congressional district should be drawn with a total population of plus or minus one person from the ideal district size.
2. Each legislative district of the General Assembly should be drawn to achieve a total population that is substantially equal as practicable, considering the principles listed below.
3. All plans adopted by the Committee will comply with Section 2 of the Voting Rights Act of 1965, as amended.
4. All plans adopted by the Committee will comply with the United States and Georgia Constitutions.
5. Districts shall be composed of contiguous geography. Districts that connect on a single point are not contiguous.
6. No multi-member districts shall be drawn on any legislative redistricting plan.
7. The Committee should consider:
  - a. The boundaries of counties and precincts;
  - b. Compactness; and
  - c. Communities of interest.
8. Efforts should be made to avoid the unnecessary pairing of incumbents.
9. The identifying of these criteria is not intended to limit the consideration of any other principles or factors that the Committee deems appropriate.

#### **B. PLANS PRODUCED THROUGH THE LEGISLATIVE AND CONGRESSIONAL REAPPORTIONMENT OFFICE**

1. Staff of the Legislative and Congressional Reapportionment Office will be available to all members of the General Assembly requesting assistance in accordance with the policy of that office.
2. Census data and redistricting work maps will be available to all members of the General Assembly upon request, provided that (a) the map was created by the requesting member, (b) the map is publicly available, or (c) the Legislative and Congressional Reapportionment Office has been granted permission by the author of the map to share a copy with the requesting member.
3. As noted above, redistricting plans and other records related to the provision of staff services to individual members of the General Assembly will not be subject to public disclosure. Only the author of a particular map may waive the confidentiality of his or her own work product. This confidentiality provision will not apply with respect to records related to the provision of staff services to any committee or subcommittee as a whole or to any records which are or have been previously disclosed by or pursuant to the direction of an individual member of the General Assembly.

C. PLANS PRODUCED OUTSIDE OF THE LEGISLATIVE AND CONGRESSIONAL REAPPORTIONMENT OFFICE

1. All plans submitted to the Committee will be made part of the public record and made available in the same manner as other committee public records.
2. All plans prepared outside the Legislative and Congressional Reapportionment Office must be submitted to that office prior to presentation to the Committee by a Member of the General Assembly for technical verification and presentation and bill preparation. All pieces of census geography must be accounted for in some district.
3. The electronic submission of material for technical verification must be made in accordance with the following requirements or in a manner specifically approved and accepted by the Legislative and Congressional Reapportionment Office.
  - a. The submission shall be in electronic format with accompanying documentation that shows the submitting sponsor of the proposed plan and contact person for the proposed plan, including email address and telephone number.
  - b. An electronic map image that clearly depicts defined boundaries, utilizing the 2020 United States Census geographic boundaries,

and a block equivalency file containing two columns. The first column shall list the 15-digit census block identification numbers, and the second column shall list the three-digit district identification number. Both block and district numbers shall be zero-filled text files. Such files shall be submitted in .xis, .xlsx, .dbf, .txt, or .csv file formats. The following is a sample:

```
BlockID, DISTRICT
"13001950100101","008"
"13001950100102","008"
"13001950100103","008"
"13001950100104","008"
"13001950100105","008"
"13001950100106","008"
```

4. If submission of the plan cannot be done electronically, the following requirements must be followed:
  - a. All drafts, amendments, or revisions should be on clearly-depicted maps that follow the 2020 Census geographic boundaries and should be accompanied by a statistical sheet listing the Census geography including the total population for each district.
  - b. All plans submitted should either be a complete statewide plan or fit back into the plan that they modified, so that the proposal can be evaluated in the context of a statewide plan. All pieces of Census geography must be accounted for in some district.

#### D. GENERAL GUIDELINES FOR PRESENTATION OF ALL PLANS

1. A redistricting plan may be presented for consideration by the Committee only through the sponsorship of one or more Member(s) of the General Assembly. All such drafts of and amendments or revisions to plans presented at any committee meeting must be on clearly-depicted maps which follow the 2020 Census geographic boundaries and accompanied by a statistical sheet listing the Census geography, including the total population and minority populations for each proposed district.
2. No plan may be presented to the Committee unless that plan makes accommodations for and fits back into a specific, identified statewide map for the particular legislative body involved.

3. All plans presented at committee meetings will be made available for inspection by the public either electronically or by hard copy available at the Office of Legislative and Congressional Reapportionment.
- E. These guidelines may be reconsidered or amended by the Committee.

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# EXHIBIT M

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## **2021 Committee Guidelines**

### **I. HEARINGS AND MEETINGS**

#### **A. PUBLIC HEARINGS**

1. A series of public hearings were held to actively seek public participation and input concerning the General Assembly's redrawing of congressional and legislative districts.
2. Video recordings of all hearings are and shall remain available on the legislative website, [www.legis.ga.gov](http://www.legis.ga.gov)

#### **B. COMMITTEE MEETINGS**

1. All formal meetings of the full committee will be open to the public.
2. When the General Assembly is not in session, notices of all such meetings will be posted at the Offices of the Clerk of the House or Secretary of the Senate and other appropriate places at least 24 hours in advance of any meeting. Individual notices may be transmitted by email to any citizen or organization requesting the same without charge. Persons or organizations needing this information should contact the Senate Press Office or House Communications Office or the Secretary of the Senate or Clerk of the House to be placed on the notification list.
3. Minutes of all such meetings shall be kept and maintained in accordance with the rules of the House and Senate. Copies of the minutes should be made available in a timely manner at a reasonable cost in accordance with these same rules.

### **II. PUBLIC ACCESS TO REDISTRICTING DATA AND MATERIALS**

- A. Census information databases on any medium created at public expense and held by the Committee or by the Legislative and Congressional Reapportionment Office for use in the redistricting process are included as public records and copies can be made available to the public in accordance with the rules of the General Assembly and subject to reasonable charges for search, retrieval, reproduction and other reasonable, related costs.
- B. Copies of the public records described above may be obtained at the cost of reproduction by members of the public on electronic media if the material exists on an appropriate electronic medium. Cost of reproduction may include not only the medium on which the copies made, but also the labor cost for the search, retrieval, and reproduction of the records and other reasonable, related costs.

- C. These guidelines regarding public access to redistricting data and materials do not apply to plans or other related materials prepared by or on behalf of an individual Member of the General Assembly using the Legislative and Congressional Reapportionment Office, where those plans and materials have not been made public through presentation to the Committee.

### **III. REDISTRICTING PLANS**

#### **A. GENERAL PRINCIPLES FOR DRAFTING PLANS**

1. Each congressional district should be drawn with a total population of plus or minus one person from the ideal district size.
2. Each legislative district of the General Assembly should be drawn to achieve a total population that is substantially equal as practicable, considering the principles listed below.
3. All plans adopted by the Committee will comply with Section 2 of the Voting Rights Act of 1965, as amended.
4. All plans adopted by the Committee will comply with the United States and Georgia Constitutions.
5. Districts shall be composed of contiguous geography. Districts that connect on a single point are not contiguous.
6. No multi-member districts shall be drawn on any legislative redistricting plan.
7. The Committee should consider:
  - a. The boundaries of counties and precincts;
  - b. Compactness; and
  - c. Communities of interest.
8. Efforts should be made to avoid the unnecessary pairing of incumbents.
9. The identifying of these criteria is not intended to limit the consideration of any other principles or factors that the Committee deems appropriate.

B. PLANS PRODUCED THROUGH THE LEGISLATIVE AND CONGRESSIONAL REAPPORTIONMENT OFFICE

1. Staff of the Legislative and Congressional Reapportionment Office will be available to all members of the General Assembly requesting assistance in accordance with the policy of that office.
2. Census data and redistricting work maps will be available to all members of the General Assembly upon request, provided that (a) the map was created by the requesting member, (b) the map is publicly available, or (c) the Legislative and Congressional Reapportionment Office has been granted permission by the author of the map to share a copy with the requesting member.
3. As noted above, redistricting plans and other records related to the provision of staff services to individual members of the General Assembly will not be subject to public disclosure. Only the author of a particular map may waive the confidentiality of his or her own work product. This confidentiality provision will not apply with respect to records related to the provision of staff services to any committee or subcommittee as a whole or to any records which are or have been previously disclosed by or pursuant to the direction of an individual member of the General Assembly.

C. PLANS PRODUCED OUTSIDE OF THE LEGISLATIVE AND CONGRESSIONAL REAPPORTIONMENT OFFICE

1. All plans submitted to the Committee will be made part of the public record and made available in the same manner as other committee public records.
2. All plans prepared outside the Legislative and Congressional Reapportionment Office must be submitted to that office prior to presentation to the Committee by a Member of the General Assembly for technical verification and presentation and bill preparation. All pieces of census geography must be accounted for in some district.
3. The electronic submission of material for technical verification must be made in accordance with the following requirements or in a manner specifically approved and accepted by the Legislative and Congressional Reapportionment Office.
  - a. The submission shall be in electronic format with accompanying documentation that shows the submitting sponsor of the proposed plan and contact person for the proposed plan, including email address and telephone number.

- b. An electronic map image that clearly depicts defined boundaries, utilizing the 2020 United States Census geographic boundaries, and a block equivalency file containing two columns. The first column shall list the 15-digit census block identification numbers, and the second column shall list the three-digit district identification number. Both block and district numbers shall be zero-filled text files. Such files shall be submitted in .xis, .xlsx, .dbf, .txt, or .csv file formats. The following is a sample:

```
BlockID, DISTRICT
"13001950100101","008"
"13001950100102","008"
"13001950100103","008"
"13001950100104","008"
"13001950100105","008"
"13001950100106","008"
```

4. If submission of the plan cannot be done electronically, the following requirements must be followed:
  - a. All drafts, amendments, or revisions should be on clearly-depicted maps that follow the 2020 Census geographic boundaries and should be accompanied by a statistical sheet listing the Census geography including the total population for each district.
  - b. All plans submitted should either be a complete statewide plan or fit back into the plan that they modified, so that the proposal can be evaluated in the context of a statewide plan. All pieces of Census geography must be accounted for in some district.

#### D. GENERAL GUIDELINES FOR PRESENTATION OF ALL PLANS

1. A redistricting plan may be presented for consideration by the Committee only through the sponsorship of one or more Member(s) of the General Assembly. All such drafts of and amendments or revisions to plans presented at any committee meeting must be on clearly-depicted maps which follow the 2020 Census geographic boundaries and accompanied by a statistical sheet listing the Census geography, including the total population and minority populations for each proposed district.
2. No plan may be presented to the Committee unless that plan makes accommodations for and fits back into a specific, identified statewide map for the particular legislative body involved.

3. All plans presented at committee meetings will be made available for inspection by the public either electronically or by hard copy available at the Office of Legislative and Congressional Reapportionment.
- E. These guidelines may be reconsidered or amended by the Committee.

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**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

ALPHA PHI ALPHA  
FRATERNITY INC., a nonprofit  
organization on behalf of members  
residing in Georgia; SIXTH  
DISTRICT OF THE AFRICAN  
METHODIST EPISCOPAL  
CHURCH, a Georgia nonprofit  
organization; ERIC T. WOODS;  
KATIE BAILEY GLENN; PHIL  
BROWN; JANICE STEWART,

*Plaintiffs,*

vs.

BRAD RAFFENSPERGER, in his  
official capacity as Secretary of State  
of Georgia.

*Defendant.*

**Case No. 1:21-cv-05337-SCJ**

**[PROPOSED] ORDER ON PLAINTIFFS' RENEWED  
MOTION FOR A PRELIMINARY INJUNCTION**

THIS MATTER comes before this Court on Plaintiffs' Renewed Motion for a Preliminary Injunction. Upon considering the motion and supporting authorities, the response from the Defendant, and the evidence and pleadings of record, this

Court finds that Plaintiffs are likely to succeed on the merits of their claims, that they will be irreparably harmed if this motion is not granted, that the balance of equities tip in Plaintiffs' favor, and that the requested equitable relief is in the public interest. It is hereby:

**ORDERED** that Plaintiffs' Renewed Motion for a Preliminary Injunction is **GRANTED**, and Defendant, his respective agents, officers, employees, and successors, and all persons acting in concert with each or any of them, are hereby **ENJOINED** from holding elections using the challenged 2021 Maps in the State of Georgia.

It is **FURTHER ORDERED** that Defendant submit duly enacted remedial state legislative maps that comport with the Voting Rights Act, or notify the Court of an inability to do so, within two weeks of this Order, or in all cases by **February 28, 2022**. *See, e.g., Ala. State Conf. of Nat'l Ass'n for Advancement of Colored People v. Alabama*, 2020 WL 583803, at \*18 (M.D. Ala. Feb. 5, 2020) (noting that if Plaintiffs prevail on their Section 2 vote dilution claim, the state would have the first opportunity to create a remedial plan (citing *Clark v. Calhoun Cnty.*, 21 F.3d 92, 95 (5th Cir. 1994))); *see also Johnson v. Miller*, 922 F. Supp. 1556, 1559 (S.D. Ga. 1995), *aff'd sub nom. Abrams v. Johnson*, 521 U.S. 74 (1997).

IT IS SO ORDERED this the \_\_\_\_\_ day of \_\_\_\_\_, 2022.

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STEVE C. JONES  
UNITED STATES DISTRICT JUDGE

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